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January 14, 2002

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 990649B-TP

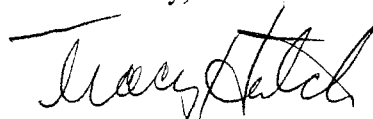
Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc. are an original and fifteen copies of WorldCom and AT&T's Joint Motion for Extension of Time in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,



Tracy W. Hatch

TWH/amb
Enclosures

cc: Claudia Davant-DeLoach, Esq.
Parties of Record

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of)
unbundled network elements)
_____)

Docket No. 990649B-TP

Filed: January 14, 2002

**WORLDCOM'S AND AT&T'S
JOINT MOTION FOR EXTENSION OF TIME**

AT&T Communications of the Southern States, Inc. ("AT&T") and MCI WorldCom, Inc. ("WorldCom"), hereby move for a continuance of the instant proceeding or in the alternative, a two-week extension of time, to February 4, 2002, to file their rebuttal testimony in this docket. As grounds therefore, AT&T and WorldCom state:

1. The AT&T/WorldCom rebuttal testimony will be based in large part on a comprehensive examination of Verizon's Integrated Cost Model ("ICM") and Wholesale UNE Non-recurring Study ("NRC") as well as the inputs to those studies which will reveal numerous and significant adjustments that should be made to the models and the inputs to those models. These adjustments will substantiate significant revisions to the UNE costs proposed by Verizon.

2. An adequate examination and analysis of a cost model and its input data is an extraordinarily complex task that requires the devotion of substantial amounts of time and resources. An adequate review of cost model also necessitates the use of highly specialized experts. In the BellSouth proceeding in Docket 990649-TP, AT&T/WorldCom engaged cost model experts who spent substantial numbers of hours in review and analysis of the BellSouth cost models in order to make an appropriately informed recommendation on BellSouth's proposed UNE rates.

3. In the BellSouth "120-Day" proceeding currently underway in Docket No. 960649A, BellSouth filed its cost studies on September 24, with revisions filed on October 8, 2001 and again on November 8, 2001. AT&T's analysis of BellSouth's cost studies began upon receipt of the initial filing. Each revision necessitated additional expert analysis in order to adequately review the cost studies and make appropriate recommendations. Testimony regarding BellSouth's cost studies was due on December 7, 2001. In addition to the volume of work required to perform an adequate analysis of the BellSouth cost studies, during the last two weeks prior to the testimony due date, the AT&T/WorldCom experts experienced several model crashes while attempting to rerun BSTLM with changed inputs. As a result, AT&T/WorldCom were unable to complete their analysis and review of the revised results. AT&T/WorldCom were finally able to file their rebuttal testimony on December 11, 2001.¹

4. The volume and complexity of the work on the BellSouth Models and the extended time that was required to prepare and file rebuttal testimony has made it virtually impossible to perform a complete and thorough analysis of the Verizon cost studies in sufficient time to file rebuttal testimony on January 16, 2001. As a result, ATT&T/WorldCom have been forced to hire additional outside experts to perform the analysis of the Verizon cost studies. Without adequate time to prepare the testimony, AT&T/WorldCom will be deprived of a reasonable opportunity to put evidence in the record in this proceeding to contest the Verizon cost models. Moreover, the Commission will be deprived the best possible record that is essential for a reasoned Commission determination consistent with the Commission's role in fostering the development of a competitive telecommunications market.

¹ An extension of time to file rebuttal testimony was granted by Order No. PSC-01-2399-PCO-TP.

5. The requested extension of time will enable the AT&T/WorldCom to complete its analysis and prepare rebuttal testimony to properly analyze the cost models and their inputs, to recommend appropriate modifications to the models and inputs, incorporate the revised model results and provide the best possible information to the Commission.

6. To accommodate the interests of the parties and the Staff of the Commission in the event the extension of time is granted, AT&T/WorldCom would propose the following:

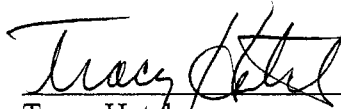
- a) Rebuttal Testimony would be filed by 12:00 Noon, February 4, 2002.
- b) Surrebuttal would be due on February 18, 2002.
- c) AT&T/WorldCom would hand-deliver 16 additional copies of the testimony to the Commission Staff to expedite the staff's review.
- d) AT&T/WorldCom would agree to a 10-day response period for discovery turnaround to the extent possible.
- e) All rebuttal testimony would be served on all parties by email the day filed.

7. Counsel for AT&T/WorldCom have consulted with counsel for Verizon and the other parties. Other than counsel for Verizon, no party objects to the requested extension of time. Florida Digital Network and Z-Tel support the Motion. Verizon does not object to the request for extension as long as Verizon is allowed to file its surrebuttal testimony 23 days after AT&T/WorldCom file their rebuttal testimony.

AT&T/WorldCom do not object to Verizon receiving its requested 23 days to file its surrebuttal.

WHEREFORE, WorldCom and AT&T respectfully request that the Commission grant an extension of time to file rebuttal testimony to the Verizon cost studies and surrebuttal testimony as set forth above.

RESPECTFULLY SUBMITTED 14th day of January, 2002.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T and WorldCom's Motion for Extension of Time in Docket 990649B-TP has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 14th day of January, 2002.

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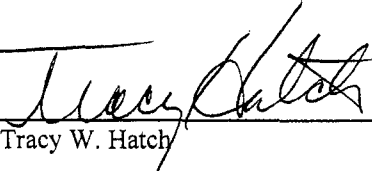
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