JAMES MEZA III Attorney

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BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

March 6, 2002

Mrs. Blanca S. Bayó Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 000028-TL (Anthony Parks Matter)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Opposed Motion for Extension of Time, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely. James Meza III

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE Docket No. 000028-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was

served by (*) Federal Express, and U.S. Mail this 6th day of March, 2002 to the

following:

Patricia Christensen (*) Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Tel. No. (850) 413-6181 Fax. No. (850) 413-6182

Administrative Procedures Committee Room 120 Holland Building Tallahassee, FL 32399-1300

Florida Cable Telecommunications Assoc. Michael A. Gross 246 E. 6th Avenue Tallahassee, FL 32303 Tel. No. (850) 681-1990 Fax. No. (850) 681-9676 mgross@fcta.com

Anthony Parks (*) 4750 South Ocean Blvd. Suite 210 Highland Beach, FL 33487 Boca Raton, FL 33481 Tel. No. (561) 338-5937 AstonD@Prodigy.Net

James Meza II

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by BellSouth Telecommunications, Inc., for Waiver of Rules 25-4.107, 25-4.108, and 25-4.113, Florida Administrative Code

Docket No. 000028-TL

Filed: March 6, 2002

BELLSOUTH TELECOMMUNICATIONS, INC.'S OPPOSED MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth") respectfully requests that the Florida Public Service Commission ("Commission") deny Mr. Anthony Parks' request for an extension of time in which to file a post-hearing brief in this docket. In support of its opposition BellSouth states the following:

1. BellSouth understands that Mr. Parks filed a motion for extension of time in which to file post-hearing briefs. To date, BellSouth has not received Mr. Parks' motion.

2. This docket was initiated on January 10, 2000. The hearing in this matter occurred on February 4, 2002, and briefs were due to be filed on March 4, 2002. BellSouth filed its Post-Hearing Brief on that date. Allowing Mr. Parks to file his brief beyond the March 4, 2002 deadline gives Mr. Parks an unfair advantage because it allows him to review BellSouth's brief prior to filing his own. In addition, Chairman Jaber, at the close of the hearing, informed both parties of the due date, instructed both parties to file their briefs on the due date, and informed both parties that the failure to file briefs resulted in a waiver of all issues. Clearly, Mr. Parks had advanced notice of when post-hearing briefs were due.

3. Counsel for BellSouth left a message with Mr. Parks to inform him of BellSouth's objection.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that the Commission deny Mr. Parks extension of time to file his brief in this docket.

Respectfully submitted this 6th day of March, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE JAMES MEZA

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