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March 8, 2002

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**By Hand Delivery**

Ms. Blanca S. Bayo', Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Room 110  
Tallahassee, Florida 32399-0850

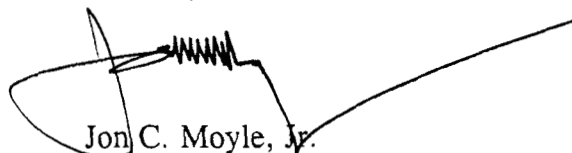
**Re: Enforcement of an Interconnection Agreement Between  
ALEC, Inc. and Sprint-Florida, Inc., PSC Docket No. 020099**

Dear Ms. Bayo':

Enclosed please find the original and 15 copies of a Motion for Extension of Time to be filed in the above-styled matter. In addition, I am enclosing a copy to be date-stamped and returned to me.

Thank you for your attention to this matter.

Sincerely,



Jon C. Moyle, Jr.

JCMJ/jd  
Enclosure

DOCUMENT NUMBER-DATE  
02743 MAR-8 8  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re:	)	
Enforcement of an Interconnection	)	Docket No. 020099-TP
Agreement Between ALEC, Inc. and	)	Filed March 8, 2002.
Sprint-Florida, Inc.	)	
_____	)	

**MOTION FOR EXTENSION OF TIME**

ALEC, Inc. (“ALEC”) and Sprint-Florida, Inc. (“Sprint”) (collectively, the “Parties”), by their attorneys, and pursuant to Rule 25-106.204(1), Florida Administrative Code, hereby respectfully move for a ten (10) day extension of time for ALEC to file a Response to the Motion to Dismiss Count II of ALEC, Inc.’s Complaint filed by Sprint on March 4, 2002, in the above-captioned proceeding (the “Motion to Dismiss”).

The Parties request that the Commission extend the deadline for ALEC to file a Response to Sprint’s Motion to Dismiss to March 26, 2002, an extension of 10 days from the deadline to file a response under Commission rules.

In support of this motion, the Parties state as follows:

1. On March 4 , 2002, counsel for Sprint mailed a copy of Sprint’s Motion to Dismiss Count II of ALEC, Inc.’s Complaint to ALEC and its counsel. Pursuant to Rules 25-106.103 and 25-104.204(1), Florida Administrative Code, ALEC’s response to the Motion to Dismiss is due March 16, 2002.

2. The Parties are currently engaged in settlement negotiations aimed at resolving Count II of ALEC’s Complaint. Upon signing a settlement agreement, ALEC intends to move

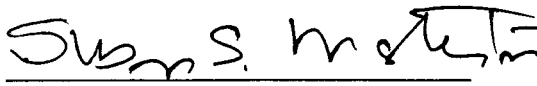
the Commission for permission to withdraw Count II and, concurrently, Sprint intends to move the Commission for permission to withdraw its pending Motion to Dismiss.

3. Both Parties anticipate that negotiations to finalize a settlement agreement on Count II may extend beyond March 16, 2002.

4. Both parties agree that an extension of the deadline to file the Response is in order. An extension of the deadline will create a climate in which the Parties can more easily resolve this portion of their dispute, allow ALEC to avoid expending time and expense on a Response that will likely not be filed, and ensure that ALEC will not feel compelled to abbreviate negotiations to avoid waiving a legal remedy. An extension will benefit both Parties, conserve the Commission's scarce resources, and advance the public interest by facilitating a return to amicable relations between the Parties.

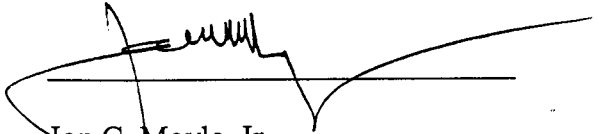
WHEREFORE, for the foregoing reasons, the Parties respectfully request that the Prehearing Officer grant this motion and authorize ALEC up to and until March 26, 2002 for the filing of its Response to Sprint's Motion to Dismiss Count II of ALEC's Complaint.

Respectfully submitted,

By: 

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*Attorneys for ALEC, Inc.*

Dated: March 8, 2002

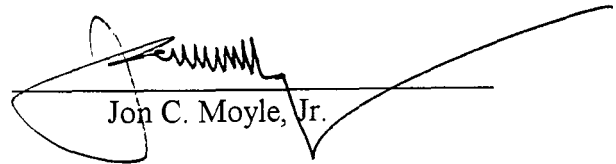
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was sent via U.S. mail on this 8th day of March, 2002 to the following:

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