

Andrew D. Shore
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0743

March 15, 2002

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

Re: Docket No. 990649A-TP (UNEs)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Joint 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,



Andrew D. Shore

(22)

Enclosure

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

DOCUMENT NUMBER DATE

U3058 MAR 15 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 990649A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Federal Express this 15TH day of March 2002 to the following:

Wayne D. Knight (hand delivery)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
Fax. No. (850) 413-6217
wknight@psc.state.fl.us
AMarsh@psc.state.fl.us (by e-mail only)

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman (+)
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. For FCCA
Atty. for BlueStar
jmcglothlin@mac-law.com

Karen Jusevitch
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6313
Fax. No. (850) 425-6361
kjusevit@att.com

Virginia C. Tate
AT&T Communications
1200 Peachtree Street, N.E.
Room 8068
Atlanta, Georgia 30309
Tel. No. (404) 810-4196
Fax No. (404) 877-7648
vctate@att.com

Richard D. Melson (+)
Gabriel E. Nieto
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI
rmelson@hgss.com

Dulaney L. O'Roark
MCI Telecommunications Corporation
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488
De.OROark@mci.com

Floyd Self
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street, Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Atty. for AT&T
Atty. for KMC Telecom III
fself@lawfla.com
thatch@lawfla.com

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585
tmonroe@comptel.org

Kimberly Caswell (+)
GTE Florida Incorporated
One Tampa City Center
201 North Franklin Street
Tampa, Florida 33602
Tel. No. (813) 483-2617
Fax. No. (813) 204-8870
kimberly.caswell@verizon.com

Karen M. Camechis (+)
Pennington, Moore, Wilkinson &
Dunbar, P.A.
215 South Monroe Street, 2nd Flr.
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Represents Time Warner
Karen@penningtonlawfirm.com

Carolyn Marek (+)
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
Carolyn.Marek@twtelecom.com

Ann Shelfer, Esquire (+)
Supra Telecom
1311 Executive Center Drive
Koger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522
ashelfer@stis.com

Brian Chaiken (+)
Supra Telecom
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4248
Fax. No. (305) 443-1078
bchaiken@stis.com

Donna Canzano McNulty, Esq. (+)
MCI WorldCom, Inc.
325 John Knox Road
The Atrium Bldg., Suite 105
Tallahassee, FL 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mculty@wcom.com

Michael A. Gross (+)
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Florida Public Telecomm. Assoc.
Angela Green, General Counsel
2292 Wednesday Street, #1
Tallahassee, FL 32308
Tel. No. (850) 201-2525
Fax. No. (850) 222-1355
abgreen@coraltelecom.com

Intermedia Communications, Inc.
Scott Sapperstein (+)
Sr. Policy Counsel
One Intermedia Way
MCFLT-HQ3
Tampa, FL 33647
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923
[SASapperstein@intermedia.com](mailto:SA_Sapperstein@intermedia.com)

Charles J. Rehwinkel (+)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Counsel for Sprint
charles.j.rehwinkel@mail.sprint.com

John P. Fons (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 224-9115
Fax. No. (850) 222-7560
Counsel for Sprint
jfons@ausley.com

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5500
Brian.Sulmonetti@wcom.com

Catherine F. Boone, Esq. (+)
Regional Counsel
Covad Communications Company
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495
Tel. No. (678) 579-8388
Fax. No. (678) 320-9433
cboone@covad.com

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491
beck.charles@leg.state.fl.us

Eric J. Branfman (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7500
Fax. No. (202) 424-7645
Represents Florida Digital Network, Inc.
ejbranfman@swidlaw.com

Matthew Feil (+)
Florida Digital Network, Inc.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
mfeil@floridadigital.net

John McLaughlin
KMC Telecom, Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043
Tel. No. (678) 985-6261
Fax. No. (678) 985-6213
jmclau@kmctelecom.com

Bettye Willis (+)
ALLTEL Communications
Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177
bettye.j.willis@alltel.com

J. Jeffry Wahlen (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 425-5471
Fax. No. (850) 222-7560
Atty. for ALLTEL
jwahlen@ausley.com

Stephen P. Bowen
Blumenfeld & Cohen
4 Embarcadero Center
Suite 1170
San Francisco, CA 94111
Tel. No. (415) 394-7500
Fax. No. (415) 394-7505
stevebowen@earthlink.net

Charles J. Pellegrini
Katz, Kutter, Haigler, Alderman, Bryant
& Yon, P.A.
106 East College Avenue
Suite 1200
Tallahassee, FL 32301
Represents Intermedia
Tel. No. (850) 577-6755
Fax No. (850) 222-0103
cjpellegrini@katzlaw.com

George S. Ford (+)
Chief Economist
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, FL 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
icanis@kelleydrye.com
mhazzard@kelleydrye.com
Counsel for Z-Tel Communications, Inc.

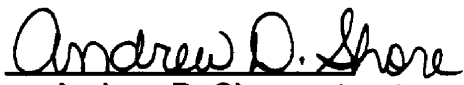
Rodney L. Joyce
Shook, Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
rjoyce@shb.com
Represents Network Access Solutions

Russell M. Blau
Thomas R. Lotterman (+)
Michael Sloan (+)
Robert Ridings (+)
Swidler Berlin Shereff Friedman
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7755
Fax. No. (202) 424-7643
Attys. for Broadslate Networks, Inc.
Attys. for Cleartel Comm.
MCSloan@swidlaw.com
mblau@swidlaw.com
rjridings@swidlaw.com
trlotterman@swidlaw.com

John Spilman
Director Regulatory Affairs and
Industry Relations
Broadslate Networks, Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911
Tel. No. (804) 220-7606
Fax. No. (804) 220-7701
john.spilman@broadslate.net

Lisa Komer Butler
VP - Regulatory & Industry Affairs
Network Plus, Inc.
41 Pacella Park Drive
Randolph, MA 02368
Tel. No. (781) 473-2977
Fax. No. (781) 473-3972
lkomer@nwp.com

Andrew O. Isar
Dena Alo-Colbeck
Miller Isar, Inc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335
Tel. No. (253) 851-6700
Fax. No. (253) 851-6474
dalocolbeck@millerisar.com
For Network Plus


Andrew D. Shore (2)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of Unbundled) Docket No.: 990649A-TP
Network Element)
_____) Filed: March 15, 2002

JOINT MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"), joined by AT&T, Florida Digital Network ("FDN") and Z-Tel, hereby respectfully move pursuant to Rule 28-106.204 of the Florida Administrative Code for an extension of the deadline for the parties to file their post-hearing briefs to and including April 19, 2002. In further support of this motion, the parties show the Commission that:

1. The Commission conducted an evidentiary hearing in this matter on March 11-12, 2002. The record in this proceeding is large. The Commission entered into the record the prefiled testimony of 11 witnesses, as well as over 70 exhibits. The exhibits consist of, among other things, deposition transcripts and scores of data request responses.
2. The issues in this phase of the proceeding are complex and technical in nature.
3. A transcript from the hearing will not be available until March 20, 2002.
4. The current deadline for the parties to submit post-hearing briefs is April 3, 2002, just two weeks after the release of the transcripts.
5. The Passover, Good Friday, and Easter Holidays will occur during the time period from when the transcript is released until the current deadline for the parties to file briefs. In addition, counsel for some of the parties have other scheduling conflicts

during that time period that will prevent them from devoting the time necessary to preparing their briefs in this matter.

6. The Commission and Staff will benefit to a greater extent from the parties' briefs if counsel for the parties have additional and adequate time to prepare their post-hearing briefs.

7. The deadline for the Staff Recommendation is May 30, 2002, and the Commission is scheduled to vote on the issues in this proceeding on June 11, 2002.

8. None of the parties, with the exception of MCI WorldCom, are opposed to a concomitant two-week extension of the deadline for the Staff to submit its Recommendation and a corresponding continuance of the Commission decision in this matter, if the Commission and/or Staff believe that is appropriate given the requested extension of the deadline for the parties to file briefs. MCI WorldCom is opposed to any delay in the Commission's decision in this matter, but it does not oppose the requested extension of the post-hearing brief deadline.

9. The current briefing schedule will place a substantial burden on the parties. The extension requested herein would, on the other hand, allow the parties adequate time to prepare post-hearing briefs that will aid the Commission in its consideration of the large, complex record in this proceeding. The short extension requested will not result in any undue delay of the Commission's decision.

WHEREFORE, BellSouth, joined by AT&T, FDN and Z-Tel, respectfully requests that the Commission extend the deadline for the parties to file their post-hearing briefs up to and including April 19, 2002.

Respectfully submitted this 15th day of March, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (22)

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



ANDREW SHORE (22)

R. DOUGLAS LACKEY

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0743

438295