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May 15, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

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COMMISSION
CLERK

Re: Docket No.: 011119-TP


Dear Ms. Bayo:

On behalf of XO Florida, Inc. (XO), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Agreed Motion for Continuance of Hearing and Request to Hold Discovery in Abeyance.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,



Vicki Gordon Kaufman

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VGK/bae
Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by XO
Florida, Inc. for Arbitration
Of Unresolved Issues in
Interconnection Agreement
With BellSouth Telecommunications,
Inc.

Docket No. 011119-TP

Filed: May 15, 2002

**AGREED MOTION FOR CONTINUANCE OF HEARING AND REQUEST
TO HOLD DISCOVERY IN ABEYANCE**

XO Florida, Inc. (XO), pursuant to rule 28-106.204, Florida Administrative Code, files this Agreed Motion for Continuance and Request to Hold Discovery in Abeyance.

As grounds therefore, XO states:

1. On August 17, 2001, XO filed its petition for arbitration with BellSouth Telecommunications, Inc. (BellSouth), pursuant to the Telecommunications Act of 1996.

The hearing in this matter is set for May 30, 2002.

2. At the time XO filed its arbitration petition, there were 14 issues open between the parties. Since the filing, the parties have worked diligently to resolve outstanding issues.

3. At the time of the Prehearing Conference held on May 6, 2002, there were 4 remaining issues between the parties.

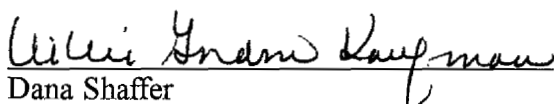
4. The parties now believe that they have reached agreement on all outstanding issues. However, the parties need the opportunity to memorialize all matters and formalize the interconnection agreement for filing with the Commission.

5. Therefore, XO requests, with the consent and agreement of BellSouth, that the Commission continue the hearing currently scheduled for May 30, 2002 and suspend

all discovery and other activities in this docket while the parties work diligently to finalize the interconnection agreement.¹

6. The parties will inform the Commission in the unlikely event it should become necessary to reschedule the hearing.

WHEREFORE, XO requests that the Commission continue the hearing currently set for May 30, 2002 and hold all discovery in abeyance pending the parties filing of a final interconnection agreement.



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Attorneys for XO Florida, Inc.

¹It is XO's understanding that the deposition of XO witness, Mr. Knowles, noticed by BellSouth for May 16, 2002, will be cancelled. Further, it is XO's understanding that the deposition of BellSouth witness, Mr. Ruscilli, noticed by Staff for May 17, 2002, will also be cancelled.

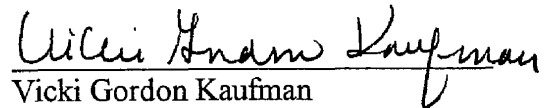
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Agreed Motion for Continuance and Request to Hold Discovery in Abeyance has been furnished by (*) hand delivery, (**) electronic mail, or by U. S. Mail on this 15th day of May, 2002, to the following:

(**) (*) Jason Fudge
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

(**) (*) James Meza
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301

(**) Patrick Turner
BellSouth Telecommunications, Inc.
675 West Peachtree Street, Suite 430
Atlanta, Georgia 30375


Vicki Gordon Kaufman