

James Meza III  
Attorney

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

June 10, 2002

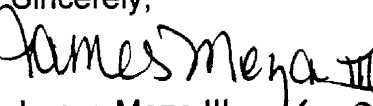
Mrs. Blanca S. Bayó  
Director, Division of the Commission  
Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: **Docket No. 020420-TP**  
**Complaint of BellSouth Telecommunications, Inc. Regarding the Practices  
Of WorldCom, Inc. in the Reporting of Percent Interstate Usage for  
Compensation for Jurisdictional Access Services**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s 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 a copy to me. Copies have been served to the parties shown on the attached certificate of service.

Sincerely,  
  
James Meza III (KA)

Enclosures

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

DOCUMENT NUMBER-DATE

06038 JUN 10 08

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 020420-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via (\*) Electronic Mail and U.S. Mail this 10th day of June, 2002 to the following:

Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Donna Canzano McNulty (\*)  
MCI WorldCom, Inc.  
325 John Knox Road  
Suite 105  
Tallahassee, FL 32303  
Tel. No. (850) 422-1254  
Fax. No. (850) 422-2586  
[donna.mcnulty@wcom.com](mailto:donna.mcnulty@wcom.com)

Floyd R. Self (\*)  
Messer, Caparello & Self, P.A.  
215 South Monroe Street  
Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
[fself@lawfla.com](mailto:fself@lawfla.com)

Dulaney L. O'Roark III (\*)  
WorldCom, Inc.  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
[De.OROark@wcom.com](mailto:De.OROark@wcom.com)

  
James Meza III (LA)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaint of BellSouth Telecommunications, Inc.     ) Docket No.: 020420-TP  
Regarding the Practices of WorldCom, Inc. in        )  
the Reporting of Percent Interstate Usage for        )  
Compensation for Jurisdictional Access Services     ) Filed: June 10, 2002  
\_\_\_\_\_ )

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

BellSouth Telecommunications, Inc. ("BellSouth"), requests that the Florida Public Service Commission ("Commission") grant it a ten (10) day extension of time or until June 21, 2002, in which to file a response to WorldCom, Inc.'s ("WorldCom") Motion to Dismiss BellSouth's Complaint. In support of this motion, BellSouth states the following:

1. On May 14, 2002, BellSouth filed a Complaint against WorldCom in the captioned docket.
2. On June 4, 2002, WorldCom filed a Motion to Dismiss ("Motion") BellSouth's Complaint. WorldCom served the Motion to Dismiss on BellSouth via Hand Delivery on that same date. Accordingly, under Rules 28-106.204(5) and 28-106.103, Florida Administrative Code, BellSouth's response is due on June 11, 2002, (seven days (7) days from service).
3. Due to other work commitments, the detailed nature of WorldCom's Motion, and the undersigned's travel schedule, BellSouth needs additional time to adequately respond to this Motion.

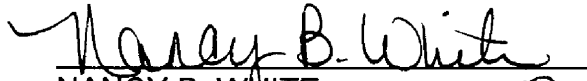
4. The parties would not be prejudiced by a ten (10) day extension of time and the Commission would benefit from receiving an informed response to the Motion.

5. BellSouth has contacted counsel for WorldCom and was informed that WorldCom does not object to BellSouth's request for an extension.

**WHEREFORE**, for the foregoing reasons, BellSouth respectfully requests that the Commission grant it a ten (10) day extension of time or until June 21, 2002 in which to respond to the Motion.

Respectfully submitted this 10th day of June, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
NANCY B. WHITE (CWA)

JAMES MEZA III  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

R. DOUGLAS LACKEY  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0747

WAYNE T. McGAW  
365 Canal Street, Room 3060  
New Orleans, Louisiana 70130  
Telephone: (504) 528-2058  
Fax: (504) 528-2948

Attorneys for BellSouth Telecommunications,  
Inc.