

Susan S. Masterton Attorney

## Law/External Affairs

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June 14, 2002

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

Re: Docket No. 020099-TP Sprint-Florida, Incorporated's Motion for Extension of Time to File Rebuttal Testimony

Dear Ms. Bayó.

Enclosed for filing is the original and fifteen (15) copies of Sprint-Florida, Incorporated's Motion for Extension of time to file Rebuttal Testimony in Docket No. 020099-TP.

Copies of this have been served pursuant to the attached Certificate of Service.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

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Susan S. Masterton

Enclosure

DOCUMENT NUMBER-DATE 06193 JUN 148 FPSC-COMMISSION CLERK

## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaint of ALEC, Inc. for enforcement of interconnection agreement with Sprint-Florida, Incorporated and request for relief. Docket No. 020099-TP

Filed: June 14, 2002

## SPRINT-FLORIDA INCORPORATED'S MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY

Sprint-Florida, Incorporated (Sprint) respectfully requests that the Florida Public Service Commission grant a one-week extension of time (from June 21, 2002 to June 28, 2002) for the parties to file rebuttal testimony in this proceeding. Sprint has consulted ALEC, Inc. (ALEC), the other party to this proceeding, who has indicated that it agrees with this Motion. In support of this Motion, Sprint states the following:

- Both parties filed discovery requests on May 31, 2002. At the request of Sprint and with the agreement of both parties, the Commission issued Order No. PSC-02-0774-PCO-TP, to amend the procedural order (Order No. PSC-02-0594-PCO-TP) to expedite the discovery process by shortening the time frame for responding to discovery to 20 days.
- 2. Even with the shortened time frame, discovery responses will not be provided to the parties until June 20, 2002, the day before rebuttal testimony is currently scheduled to be filed.
- 3. Sprint requests a one-week delay in filing rebuttal testimony (from June 21, 2002 until June 28, 2002) so that Sprint may have sufficient time to review the discovery responses prior to finalizing its rebuttal testimony.

- 4. A one-week delay in filing rebuttal testimony will not affect any of the other dates set forth in the procedural order. Prehearing statements are due on July 8, 2002, the prehearing is scheduled for July 22, 2002, and the hearing is scheduled for August 7, 2002. In addition, under the expedited discovery schedule, parties still will have sufficient time to conduct a second round of discovery subsequent to rebuttal testimony being filed on June 28. As long as discovery is submitted by July 12, 2002, it will be completed by the July 31, 2002 cut-off date set forth in the procedural order.
- 5. An extension of time would allow the parties to fully prepare and present their cases to the Commission.
- 6. The parties would not be prejudiced by the extension for the reasons set forth above. WHEREFORE, for the foregoing reasons, Sprint respectfully requests that the Commission grant the parties a one-week extension of time, until June 28, 2002, to file their rebuttal testimony.

Respectfully submitted this 14<sup>th</sup> day of June 2002.

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ATTORNEY FOR SPRINT

## CERTIFICATE OF SERVICE DOCKET NO. 020099-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery\* or U.S. Mail this 14th day of June, 2002 to the following:

Volaris Telecom, Inc. Ms. Judy B. Tinsley c/o DURO Communications, Inc. 3640 Valley Hill Road, N.W. Kennesaw, GA 30152-3238

Cole, Raywid & Braverman, L.L.P John C. Dodge/David N. Tobenkin 1919 Pennsylvania Avenue, N.W., #200 Washington, DC 20006

Moyle Law Firm (Tall) Jon Moyle/Cathy Sellers 118 North Gadsden Street Tallahassee, Florida 32301

Linda Dodson, Esq \* Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0870

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