

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of US LEC of Florida )
Inc., Time Warner Telecom of Florida, LP )
and ITC^DeltaCom Communications )
objecting to and requesting suspension )
of proposed CCS7 Access Arrangement )
Tariff filed by BellSouth )
Telecommunications, Inc. )

Docket No. 02-0129-TP

Filed: July 2, 2002

MOTION FOR LEAVE TO FILE DIRECT TESTIMONY AND EXHIBITS OUT OF TIME

MCI WorldCom Communications, Inc ("WorldCom"), and MCImetro Access Transmission Services, LLC ("MCImetro Access") hereby move to file direct testimony and exhibits in this proceeding one day after the filing date set forth in the Order Establishing Procedure No PSC-02-0853-PCO-TP. In support, WorldCom and MCImetro Access state:

1. Under the Order Establishing Procedure, direct testimony and exhibits were to be filed by 5:00 p.m. on July 1, 2002. WorldCom and MCImetro Access intended to file direct testimony and exhibits along with a Petition to Intervene by such time. However, due to computer problems at undersigned counsel's office, there was a delay in final preparation of the documents. As a result, the documents were delivered to the Commission minutes after the Clerk's office closed at 5:00 p.m.

2. WorldCom and MCImetro Access are filing this motion, along with the Petition to Intervene and direct testimony and exhibits, as the Clerk's Office opens on July 2, 2002.

Moreover, WorldCom and MCImetro timely served all parties copies of the direct testimony and exhibits on July 1, 2002. Accordingly, no parties are prejudiced by the short filing delay.

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3. In this docket, the Commission will address BellSouth's proposal to establish a new tariff that would apply to intrastate access related to SS7 service. The effect of this Proposed Tariff may be that every ILEC, ALEC, IXC and wireless carrier will raise rates to recover this new charge from either other carriers or from the consumer and will also restructure their access tariffs to charge BellSouth the SS7 message costs that each of these carriers also incur to complete calls.

4. WorldCom and MCImetro Access are certified by the Commission as alternative local exchange telecommunications company ("ALECs"). Also, WorldCom is certified by the Commission as interexchange telecommunications company ("IXC"). Both WorldCom and MCImetro Access may be subject to the SS7 message charges reflected in the Proposed Tariff. Accordingly, the substantial rights and interests of both WorldCom and MCImetro Access are affected by the Proposed Tariff and the decisions made by the Commission concerning the Proposed Tariff in this proceeding. WorldCom and MCImetro Access respectfully submit that their direct testimony and exhibits will assist the Commission in its consideration of this matter

5. In accordance with Rule 28-106.204(3), Fla. Admin. Code, undersigned counsel has attempted to confer with all parties regarding their position on this motion. Counsel for the Commission, BellSouth Telecommunications, Inc., and Time Warner Telecom of Florida, LP, all indicated that they do not object to this motion. Undersigned counsel was not able to reach USLEC of Florida, Inc., or ITC^DeltaCom Communication to determine their position on this motion.

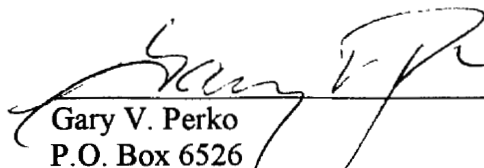
WHEREFORE, MCI WorldCom Communications, Inc ("WorldCom"), and MCImetro Access Transmission Services, LLC ("MCImetro Access") hereby move to file direct testimony

and exhibits in this proceeding one day after the filing date set forth in the Order Establishing Procedure No PSC-02-0853-PCO-TP.

RESPECTFULLY SUBMITTED this 2<sup>d</sup> day of July, 2002.

HOPPING GREEN & SAMS, P.A.

By:

  
Gary V. Perko  
P.O. Box 6526  
Tallahassee, FL 32314

Attorneys for MCI WorldCom  
Communications, Inc. and MCI metro  
Access Transmission Service, LLP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by fax and regular U.S. mail to all known parties of record in Docket No. 020129-TP this 2nd day of July, 2002.

Jason Fudge\*  
FL Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Pennington Law Firm  
Karen Camechis  
P.O. Box 10095  
Tallahassee, FL 32302-2095

BellSouth Telecommunications, Inc.  
Ms. Nancy B. White/Jame Meza III  
c/o Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

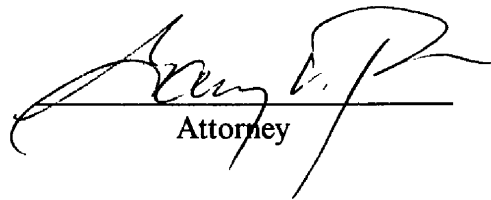
Rutledge Law Firm  
Ken Hoffman/J. Ellis/Martin McDonnell  
P.O. Box 551  
Tallahassee, FL 32302

Florida Cable Telecommunications Assoc.,  
Inc.  
Michael A. Gross  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

Time Warner Telecom of Florida, L.P.  
Ms. Carolyn Marek  
Time Warner Telecom  
233 Bramerton Court  
Franklin, TN 37069-4002

ITC^DeltaCom  
Ms. Nanette S. Edwards  
4092 South Memorial Parkway  
Huntsville, AL 35802-4343

US LEC of Florida Inc.  
Mr. Greg Lunsford  
6801 Morrison Blvd.  
Charlotte, NC 28211-3599

  
Attorney