

**RUTLEDGE, ECENIA, PURNELL & HOFFMAN**

PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS AT LAW

**ORIGINAL**

STEPHEN A. ECENIA  
RICHARD M. ELLIS  
KENNETH A. HOFFMAN  
THOMAS W. KONRAD  
MICHAEL G. MAIDA  
MARTIN P. McDONNELL  
J. STEPHEN MENTON

POST OFFICE BOX 551, 32302-0551  
215 SOUTH MONROE STREET, SUITE 420  
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788  
TELECOPIER (850) 681-6515

R. DAVID PRESCOTT  
HAROLD F. X. PURNELL  
MARSHA E. RULE  
GARY R. RUTLEDGE  
GOVERNMENTAL CONSULTANTS  
MARGARET A. MENDUNI  
M. LANE STEPHENS

September 27, 2002

Ms. Blanca Bayo, Director  
Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard, Room 110  
Betty Easley Conference Center  
Tallahassee, FL 32399-0850

**VIA HAND DELIVERY**

RECEIVED FPSC  
02 SEP 27 PM 3:23  
COMMISSION  
CLERK

Re: Docket No. 020129-TP

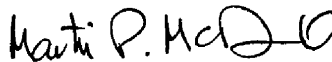
Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of US LEC of Florida Inc., Time Warner Telecom of Florida, LP, MCI WorldCom, Inc. and BellSouth Telecommunications, Inc. ("Joint Movants"), are the original and fifteen copies of the Joint Motion for Extension of Time to File Posthearing Briefs.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,



Martin P. McDonnell

AUS MPM/rl  
CAF Enclosures  
CMP cc: All Parties of Record  
COM FAUSERS\ROXANNE\USLEC\arbitration-Bayo.9.27ltr  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC P  
OTH \_\_\_\_\_

**RECEIVED & FILED**

  
**FPSC-BUREAU OF RECORDS**

DOCUMENT NUMBER-DATE

10393 SEP 27 02

FPSC-COMMISSION CLERK

**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. 020129-TP

Filed: September 27, 2002

**JOINT MOTION FOR EXTENSION OF TIME  
TO FILE POSTHEARING BRIEFS**

ITC^DeltaCom Communications, US LEC of Florida Inc., Time Warner Telecom of Florida, LP, MCI WorldCom, Inc. and BellSouth Telecommunications, Inc. (hereafter "Joint Movants"), by and through undersigned counsel and pursuant to Rule 28-106.204(1), Florida Administrative Code, hereby file a Motion for Extension of Time for all parties to file posthearing briefs. The parties request an extension of seven (7) days up to and until October 8, 2002 to file posthearing briefs, with no other delays to the procedural schedule. In support of this Motion, Joint Movants state:

1. Pursuant to Order No. PSC-02-0853-PCO-TP issued June 21, 2002, posthearing briefs are due to be filed on or before October 1, 2002.
2. Joint Movants agreed to meet on September 26, 2002, for the purpose of attempting to negotiate a settlement regarding all outstanding issues in this docket.
3. The requested extension of time will allow all parties a reasonable period of time to engage in negotiations in an attempt to settle all outstanding issues in the docket, and if negotiations fail, to file posthearing briefs.

DOCUMENT NUMBER-DATE  
10393 SEP 27 02  
FPSC-COMMISSION CLERK

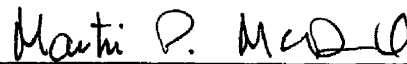
4. No party will be prejudiced by the granting of this motion. Commission staff is currently scheduled to file its recommendation with the Commission on or before November 21, 2002.

5. Undersigned counsel has spoken with counsel for all other Joint Movants and is authorized to represent to the Commission that all Joint Movants are in agreement with this request.

WHEREFORE, for the foregoing reasons, Joint Movants respectfully request an Order granting this Motion and authorizing an extension of time of seven (7) days up to and until October 7, 2002, for all parties to file posthearing briefs.

Respectfully submitted this 27<sup>th</sup> day of September, 2002.

Respectfully submitted,



Kenneth A. Hoffman, Esq.  
Martin P. McDonnell, Esq.  
Rutledge, Ecenia, Purnell & Hoffman, P.A.  
P. O. Box 551  
Tallahassee, FL 32302  
(850) 681-6788 (Telephone)  
(850) 681-6515 (Telecopier)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Proposed Issues was furnished by U. S. Mail to the following this 27th day of September, 2002:

Jason Fudge, Esq.  
Adam Teitzman, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard, Room 370  
Tallahassee, FL 32399-0850

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

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

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

Michael A. Gross, Esq.  
Florida Cable Telecommunications Assoc., Inc.  
246 East 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303

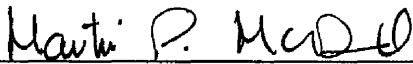
Richard D. Melson, Esq.  
Gary V. Perko, Esq.  
Hopping Green & Sams, P.A.  
P.O. Box 6526  
Tallahassee, FL 32314

Donna Canzano McNulty, Esq.  
MCI WorldCom Communications, Inc.  
325 John Knox Road  
The Atrium, Suite 105  
Tallahassee, FL 32303-4131

Brian Sulmonetti, Esq.  
MCI WorldCom Communications, Inc.  
Concourse Corporate Center Six  
Six Concourse Parkway, Suite 3200  
Atlanta, GA 30328

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

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

  
MARTIN P. MCDONNELL, ESQ.