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December 10, 2002

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Ms. Blanca Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Docket Nos. 020119-TP and 020578-TP Re:

Dear Ms. Bayo:

HAND DELIVERY

Enclosed herewith for filing in the above-referenced docket on behalf of US LEC of Florida Inc., XO Florida, Inc. and Time Warner Telecom of Florida, L.P. ("Joint ALECs") are the original and fifteen copies of the Joint ALECs' Motion for Extension of Time.

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,

Kenneth A. Hoffman

AUS -KAH/rl CMP . Enclosures COM 5 cc: All Parties of Record USLEC\bayo1210 ECR

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Digital Network,)
Inc., for Expedited Review and Cancellation)
of BellSouth's Telecommunications, Inc.'s) Docket No. 020119-TP
Key Customer Promotional Tariffs)
and For an Investigation of BellSouth)
Telecommunications, Inc.'s Promotional)
Pricing and Marketing Practices.)
In re: Petition of the Florida Competitive Carriers))
Association for Expedited Review and Cancellation) Docket No. 020578-TP
of BellSouth Telecommunications, Inc.'s Key)
Customer Promotional Tariffs.)
	Filed: December 10, 2002

US LEC OF FLORIDA INC., TIME WARNER TELECOM OF FLORIDA, L.P., AND XO FLORIDA, INC.'S MOTION FOR EXTENSION OF TIME

US LEC of Florida Inc., Time Warner Telecom of Florida, L.P. and XO Florida, Inc. ("Joint ALECs"), by and through their undersigned counsel, hereby request a two day extension of time for the filing of the Joint ALECs' response to BellSouth Telecommunications, Inc.'s ("BellSouth") Motion to Compel. In support of this Motion, the Joint ALECs state as follows:

- On November 21, 2002, BellSouth filed a Motion to Compel responses to BellSouth's
 First Set of Interrogatories and First Request for Production of Documents previously served on the
 Joint ALECs.
- 2. On December 3, 2002, counsel for the Joint ALECs reached an agreement with counsel for BellSouth whereby the Joint ALECs would be provided an additional two days - until December 5, 2002 - to file the Joint ALECs' Response to BellSouth's Motion to Compel. Joint ALECs' counsel inadvertently neglected to file a motion pursuant to Rule 28-106.204(5), Florida Administrative Code, requesting the Prehearing Officer to authorize the two additional days for the

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filing of the Joint ALECs' Response.

3. Accordingly, the Joint ALECs request that the Prehearing Officer enter an Order granting the two additional days for the filing of the Joint ALECs' Response to BellSouth's Motion to Compel.

4. Counsel for the Joint ALECs has conferred with counsel for BellSouth and is authorized to represent that BellSouth does not object to the extension of time requested in this Motion.

WHEREFORE, the Joint ALECs request that the Prehearing Officer enter an Order granting the Joint ALECs an extension of time of two additional days for the filing of the Joint ALECs' Response to BellSouth's Motion to Compel.

Respectfully submitted this 10th day of December, 2002.

Kenneth A. Hoffman, Esq. Martin P. McDonnell, Esq.

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Counsel for US LEC of Florida, Inc., Time Warner Telecom of Florida, L.P. and XO Florida, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 10th day of December, 2002:

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