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October 2, 2003

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

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Re: Docket No. 981834-TP & 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and 15 copies of Sprint-Florida, Incorporated's ("Sprint") Motion for Extension of Time.

Copies are being served on the parties in this docket via electronic and US mail.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

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Enclosure

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DOCUMENT NUMBER-DATE

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**CERTIFICATE OF SERVICE  
DOCKET NO. 981834-TP & 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Electronic and U.S. mail this 2<sup>nd</sup> day of October, 2003 to the following:

Adam Teitzman, Esq.  
Jason Rojas, Esq.  
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c/o Nancy H. Sims  
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Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

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Susan S. Masterton

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for  
Commission action to support local  
competition in BellSouth  
Telecommunications, Inc.'s service territory.

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DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated  
Connections, Inc. for generic investigation to  
ensure that BellSouth Telecommunications,  
Inc., Sprint-Florida, Incorporated, and GTE  
Florida Incorporated comply with obligation to  
provide alternative local exchange carriers  
with flexible, timely, and cost-efficient  
physical collocation.

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DOCKET NO. 990321-TP

Filed: October 2, 2003

**MOTION FOR EXTENSION OF TIME**

Sprint-Florida, Incorporated ("Sprint") moves this Commission for an extension of time to respond to AT&T's Motion to Compel Discovery from Sprint-Florida, Inc. In support thereof, Sprint states as follows:

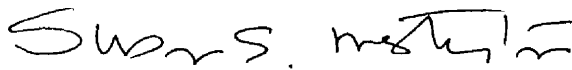
1. On August 27, 2003, AT&T served Sprint with its Third Set of Interrogatories (Nos. 15-17). On September 8, 2003, Sprint filed its General Objections to the Interrogatories. On September 16, 2003, Sprint filed its Responses and Objections to AT&T's interrogatories.
2. On September 25, 2003, AT&T filed its Motion to Compel Discovery from Sprint-Florida, Inc. ("Motion to Compel") Sprint's response to the Motion to Compel is due today (seven days after the Motion to Compel was served by e-mail on Sprint.)

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3. Sprint and AT&T are in discussions to resolve their discovery dispute. To the extent that the dispute is resolved, the Motion to Compel would become moot. In order to give Sprint and AT&T sufficient time to reach a resolution of the dispute, Sprint requests an extension of time to file a response to AT&T's Motion to Compel until Oct. 10, 2003.
4. Counsel for AT&T has indicated that AT&T does not object to this request for an extension of time for Sprint to respond to the Motion to Compel.

WHEREFORE, in light of the above, Sprint respectfully requests that the Commission grant Sprint's request for an extension of the time to respond to AT&T's Motion to Compel.

RESPECTFULLY SUBMITTED this 2nd day of October 2003.



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ATTORNEY FOR SPRINT