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December 18, 2003

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**BY HAND DELIVERY**

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed for filing are an original and 15 copies of AT&T Communications of the Southern States, LLC's Motion to Amend Procedural Schedule in the above-referenced docket.

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

Thank you for your assistance with this filing.

Sincerely yours,

Tracy W. Hatch

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FPSC-BUREAU OF RECORDS

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Enclosure  
cc: Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal) Docket No. 030851-TP
Communications Commission triennial UNE Review: Local)
Circuit Switching for Mass Market Customers ) Filed: December 18, 2003

AT&T'S MOTION TO AMEND PROCEDURAL SCHEDULE

By Order No. PSC-03-1265-PCO-TP, issued November 7, 2003, the Prehearing Officer established the current procedural schedule to govern events in the instant proceeding. Pursuant to Rule 28.106-204, Florida Administrative Code, AT&T Communications of the Southern States, LLC, ("AT&T") hereby respectfully moves the Prehearing Officer to modify certain of the procedural dates in this proceeding as follows:

Table with 3 columns: Current, Proposed, and Testimony types (Rebuttal, Surrebuttal).

All other procedural dates to remain the same. In support of its Motion AT&T states:

1. The instant proceeding was initiated in response to the Federal Communications Commission's August 21, 2003 Triennial Review Order (TRO). Pursuant to the TRO, state commissions must conduct a review of whether impairment exists with regard to local circuit switching for mass market customers. Such reviews must be complete within nine months from the TRO's effective date.

2. The issues raised in the TRO surrounding an assessment of whether impairment exists regarding local circuit switching are ones of first impression before this Commission. The analysis required to adequately respond to the questions raised in the

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TRO is exceedingly complex and requires the acquisition and review of very large amounts of technical information.

3. Parties filed direct testimony in this proceeding on December 4, 2003.

4. AT&T as well as the other parties in this proceeding have diligently pursued discovery to obtain the information necessary to complete their respective analyses and to support their respective testimony. However, it has become clear that there is insufficient time in the current procedural schedule to adequately analyze the volume of information already gathered as well as the information expected to be provided by the parties that is necessary to adequately prepare rebuttal testimony. Accordingly, AT&T requests that the time for filing rebuttal testimony be extended until January 7, 2004, as noted. The additional time will benefit all parties and the Commission through the opportunity to better present all the information necessary to the resolution of the issues in the case. It must be noted that an extension of the time to file rebuttal testimony will necessitate an extension of the time to file surrebuttal. Therefore, AT&T also requests that the time for filing surrebuttal testimony be extended until January 28, 2004.

5. In accordance with Rule 28-104.106, the following parties have been advised of this motion: BellSouth Telecommunications, Inc. (BellSouth); MCI WorldCom Communications, Inc. ("MCI"); Florida Cable Telecommunications, Inc. ("FCTA"); Covad Communications Company ("Covad"); Verizon Florida, Inc. ("Verizon"); Sprint-Florida, Incorporated ("Sprint"); Florida Digital Network ("FDN"); Allegiance Telecom, Inc. ("Allegiance"); Granite Telecommunications, LLC ("Granite"); New South Communications ("New South"); KMC Telecom ("KMC"); ITC DeltaCom

("DeltaCom"); NuVox Communications, Inc. ("NuVox"); Xspedius Communications ("Xspedius"); Z-Tel Communications, Inc. ("Z-Tel"); American Association of Retired Persons ("AARP"); and Counsel for the Staff of the Florida Public Service Commission. All parties support the requested extension of the dates for filing rebuttal and surrebuttal testimony.

6. In view of the extension of time requested for filing rebuttal and surrebuttal testimony, the Staff of the Commission has asked that the response time for discovery requests be shortened to fifteen (15) days from the date of service. Each of the parties agrees with the Staff's request except BellSouth. BellSouth agrees to a 15-day response time for one set of discovery requests served on or after January 7, 2004.

WHEREFORE, AT&T respectfully requests that the Commission modify the procedural dates for the filing of rebuttal and surrebuttal testimony as set forth above.

RESPECTFULLY SUBMITTED 18th day of December, 2003.

  
Tracy Hatch  
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Southern States, LLC  
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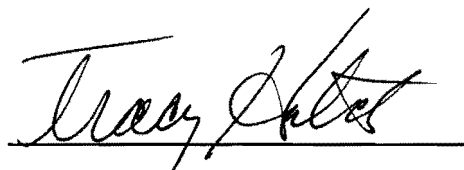
**CERTIFICATE OF SERVICE**  
**DOCKET NO. 030851-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail or as indicated this 18<sup>th</sup> day of December 2003, to the following parties of record:

Adam Teitzman Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 VIA HAND DELIVERY	BellSouth Telecommunications, Inc. * Nancy B. White c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: (850) 224-7798 Fax: 222-8640 Email: <a href="mailto:nancy.sims@bellsouth.com">nancy.sims@bellsouth.com</a> VIA ELECTRONIC SERVICE FILING AND OVERNIGHT MAIL
Florida Cable Telecom. Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303 Phone: 850-681-1990 Fax: 681-9676 Email: <a href="mailto:mgross@fcta.com">mgross@fcta.com</a> VIA U.S. MAIL	<u>MCI WorldCom Communications, Inc. *</u> Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: 219-1018 Email: <a href="mailto:donna.mcnulty@wcom.com">donna.mcnulty@wcom.com</a> VIA ELECTRONIC SERVICE FILING
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<p>Messer Law Firm *  Floyd Self/Norman Horton  P.O. Box 1876  Tallahassee, FL 32302-1876  Phone: 850-222-0720  Fax: 224-4359  VIA ELECTRONIC SERVICE FILING</p>	<p>MCI WorldCom Communications, Inc.(GA) *  De O'Roark, Esq.  Six Concourse Parkway, Suite 600  Atlanta, GA 30328  Email: <a href="mailto:de.oroark@wcom.com">de.oroark@wcom.com</a>  VIA ELECTRONIC SERVICE FILING</p>
<p>Granite Telecommunications, LLC  Rand Currier/Geoff Cookman  234 Copeland Street  Quincy, MA 02169-4005  Phone: (617) 847-1500  Fax: (617) 847-0931  Email: <a href="mailto:rcurrier@granitenet.com">rcurrier@granitenet.com</a>  VIA U.S. MAIL</p>	<p>Miller Isar, Inc.  Andrew O. Isar  7901 Skansie Avenue, St. 240  Gig Harbor, WA 98335  Phone: (253) 851-6700  Fax: (253) 851-6474  Email: <a href="mailto:aisar@millerisar.com">aisar@millerisar.com</a>    VIA U.S. MAIL</p>
<p>Moyle Law Firm (Tall)  Jon Moyle, Jr.  The Perkins House  118 North Gadsden Street  Tallahassee, FL 32301  Phone: (850) 681-3828  Fax: 681-8788  Email: <a href="mailto:jmoylejr@moylelaw.com">jmoylejr@moylelaw.com</a>    VIA U.S. MAIL</p>	<p>NewSouth Communications Corp. *  Jake E. Jennings  Two North Main Center  Greenville, SC 29601-2719  Phone: (864) 672-5877  Fax: (864) 672-5313  Email: <a href="mailto:jejennings@newsouth.com">jejennings@newsouth.com</a>    VIA ELECTRONIC SERVICE FILING</p>
<p>BellSouth Telecommunications, Inc.*  R. Douglas Lackey  675 W. Peachtree Street, Suite 4300  Atlanta, GA 30375  VIA HAND DELIVERY</p>	<p>Supra Telecommunications and Info. Systems  Jorge Cruz-Bustillo  2620 S.W. 27<sup>th</sup> Avenue  Miami, FL 33133  Phone: (305) 476-4252  Fax: (305) 443-1078  Email: <a href="mailto:Jorge.cruz-bustillo@stis.com">Jorge.cruz-bustillo@stis.com</a>  VIA U.S. MAIL</p>
<p>Supra Telecommunications and Info. Systems  Jonathan Audu  1311 Executive Center Drive, Suite 220  Tallahassee, FL 32301-5027  Phone: (850) 402-0510  Fax: (850) 402-0522  <a href="mailto:Jonathan.audu@stis.com">Jonathan.audu@stis.com</a>  VIA U.S. MAIL</p>	<p>Sprint (KS)  Kenneth A. Schifman  6450 Sprint Parkway  Mailstop: KSOPHN0212-2A303  Overland Park, KS 66251-6100  Phone: 913-315-9783  VIA U.S. MAIL</p>
<p>Sprint (NC)</p>	<p>Xspedius Communications</p>

<p>H. Edward Phillips, III  14111 Capital Blvd.  Mailstop: NCWKFR0313-3161  Wake Forest, NC 27587-5900  Phone: 919-554-7870  VIA U.S. MAIL</p>	<p>Ms. Rabinai E. Carson  5555 Wingham Blvd., Suite 300  O'Fallon, MO 63366-3868  Phone: (301) 361-4220  Fax: (301) 361-4277  Email: <a href="mailto:rabinai.carson@xspedius.com">rabinai.carson@xspedius.com</a>  VIA U.S. MAIL</p>
<p>Matthew Feil  FDN Communications  390 North Orange Avenue  Suite 2000  Orlando, FL 32801  (407) 835-0460  <a href="mailto:mfeil@mail.fdn.com">mfeil@mail.fdn.com</a>  VIA ELECTRONIC SERVICE FILING AND  U.S. MAIL</p>	<p>Scott A. Kassman  FDN Communications  390 North Orange Avenue  Suite 2000  Orlando, FL 32801  (407) 447-6636  <a href="mailto:skassman@mail.fdn.com">skassman@mail.fdn.com</a>  VIA ELECTRONIC SERVICE FILING AND  U.S. MAIL</p>
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