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January 23, 2004

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

**HAND DELIVERY**

Re: Docket No. 031125-TP

Dear Ms. Bayo:

Enclosed herewith for filing on behalf of IDS Telecom, LLC ("IDS") are the original and fifteen copies of IDS' Unopposed Motion for Extension of Time.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely,



Martin P. McDonnell

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04 JAN 23 PM 12:30  
COMMISSION  
CLERK

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Enclosures

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaint of IDS Telecom, LLC against )  
BellSouth Telecommunications, Inc. for ) Docket No. 031125-TP  
overbilling and discontinuance of service, and )  
petition for emergency order restoring service. ) Filed: January 23, 2004  
\_\_\_\_\_)

**IDS TELCOM, LLC'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME**

IDS TELCOM, LLC ("IDS"), pursuant to Rule 28-106.204(5), Florida Administrative Code, and by and through its undersigned counsel, respectfully requests that the Florida Public Service Commission ("Commission") grant IDS a fourteen (14) day extension of time or until February 6, 2004 in which to file a response to BellSouth Telecommunications, Inc.'s ("BellSouth") Motion to Dismiss and Answer, and as grounds therefor states:

1. On December 23, 2003, IDS filed a Complaint against BellSouth for Overbilling and Discontinuance of Service and a Petition for Emergency Order Restoring Service. On December 30, 2003, IDS filed an Amended Complaint for Overbilling and Discontinuance of Service and a Petition for Emergency Order Restoring Service in the above-captioned docket. On January 16, 2004, BellSouth filed a Motion to Dismiss and Answer to IDS' Amended Complaint. Based upon issues raised in BellSouth's Motion to Dismiss and Answer, as well as a desire on the part of all counsel to narrow the issues raised in the Complaint and Motion to Dismiss, IDS desires an extension of time within which IDS must respond to BellSouth's Motion to Dismiss and Answer.

2. IDS has contacted counsel for BellSouth and has been advised that BellSouth agrees that the Commission should grant this Motion for Extension of Time.

DOCUMENT NUMBER- DATE

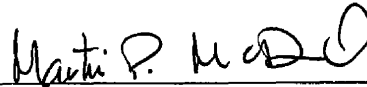
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FPSC-COMMISSION CLERK

3. Due to the fact that IDS's response is due on January 23, 2004, IDS respectfully requests expedited treatment of the instant Motion.

WHEREFORE, for the foregoing reasons, IDS respectfully requests that the Commission grant it a fourteen (14) day extension or until February 6, 2004, in which to file a response to BellSouth's Motion to Dismiss and Answer.

Respectfully submitted,



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MARSHA E. RULE, ESQ.

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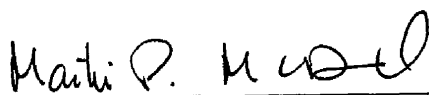
Attorneys for IDS Telecom LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT a copy of the foregoing was furnished by hand delivery this 23rd day of January 2004, to the following:

Beth Keating, Esq.  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

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

  
\_\_\_\_\_  
MARTIN P. MCDONNELL, ESQ.