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March 25, 2004

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

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MAR 25 PM 4:16
COMMISSION
CLERK

Re: Docket No.: 020960-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) and Verizon Florida, Inc., enclosed for filing and distribution are the original and 15 copies of the following:

- Joint Motion of DIECA Communications Inc. d/b/a Covad Communications Company and Verizon Florida, Inc. for Extension of Time to File Interconnection Agreement.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

AUS _____
CAF _____
CMP _____
COM 3 VGK/bae
CTR _____ Enclosures
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SCL _____
DPC _____ cc: Richard Chapkis
MMS _____
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DOCUMENT NUMBER-DAT

McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN & ARNOLD, P.A. 03956 MAR 25 3

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of open issues
resulting from interconnection negotiations with
Verizon Florida, Inc. by DIECA Communications,
Inc. d/b/a Covad Communications Company.

Docket No.: 020960-TP
Filed: March 25, 2003

**Joint Motion of DIECA Communications, Inc. d/b/a Covad Communications Company
and
Verizon Florida, Inc. for Extension of Time to File Interconnection Agreement**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) and Verizon Florida, Inc. (Verizon) (hereinafter Movants), pursuant to rule 28-106.204, Florida Administrative Code, file this Joint Motion for Extension of Time to File Interconnection Agreement. In light of the FCC's *Triennial Review Order (TRO)* and Verizon's Petition before this Commission for a Consolidated Arbitration to amend its interconnection agreements with CLECs in accordance with the *TRO* (Docket No. 040156-TP), Joint Movants request that the Commission allow them to file their Interconnection Agreement in this matter after this Commission issues a ruling in the Consolidated TRO Arbitration. As grounds therefore, Movants state:

1. In Order No. PSC-03-1296-PCO-TP, the Commission granted the Movants' motion for extension of time to file their interconnection agreement until 21 days following the issuance of its order ruling on Covad's motion for reconsideration.

2. That order, Order PSC-04-0106-FOF-TP (disposing of Covad's motion for reconsideration), was entered on January 30, 2004. Pursuant to the Order, the parties were to file their Interconnection Agreement by February 20, 2004.

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FPSC-COMMISSION CLERK

3. In Order No PSC-04-0241-PCO-TP, the Commission granted the Movants' subsequent motion for extension of time to file their interconnection agreement on March 26, 2004.

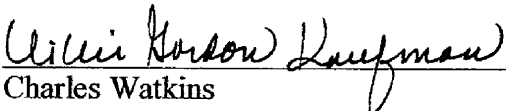
4. On February 20, 2004, Verizon filed its Petition for Consolidated Arbitration. On March 19, 2004, Verizon amended that petition. Covad, among many other providers, is included among the CLECs named in Verizon's Petition for Consolidated Arbitration.

5. With respect to a vast majority of the Commission's determinations in this docket, the Movants were able to draft language that both parties agreed is consistent with the Commission's Order. Nonetheless, Movants were not able to reach agreement on how to address the *TRO* in the Interconnection Agreement. Both parties are prepared to file with the Commission their interpretations of the Commission's rulings and agree that further action by the Commission is necessary to resolve their disputes. However, it appears that these issues will be the topic of Docket No. 040156-TP. It would serve the interests of judicial economy and efficiency if that docket were resolved before Movants are required to file their Interconnection Agreement in this docket.

6. The *TRO* constitutes a "regulatory . . . or other governmental decision, order, determination or action" that may materially affect one or more material provisions of the Movants' Interconnection Agreement. Accordingly, it would be efficient to delay filing of the Interconnection Agreement until the Commission addresses the issues in the Consolidated *TRO* Arbitration.

7. Movants will continue to operate under the terms of their existing Interconnection Agreement and reserve the right to enforce the provisions in their existing Interconnection Agreement.

WHEREFORE, Movants request that the Commission permit them to file their conforming Interconnection Agreement following and in accordance with the Commission's ruling in the Consolidated TRO Arbitration.


Charles Watkins
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Attorney for Verizon

CERTIFICATE OF SERVICE

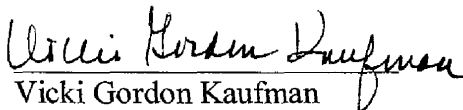
I **HEREBY CERTIFY** that a true and correct copy of the foregoing Joint Motion of DIECA Communications, Inc. d/b/a Covad Communications Company and Verizon Florida, Inc. for Extension of Time to File Interconnection Agreement has been provided by (*) hand delivery or U.S. Mail this 25th day of March 2004 to the following:

(*) Lee Fordham
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