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August 17, 2004

BY HAND DELIVERY

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

Re: Docket No. 030137-TP

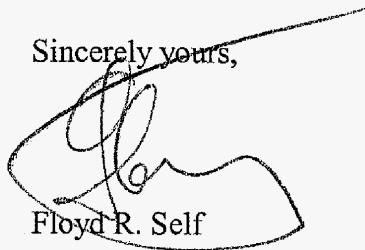
Dear Ms. Bayó:

Enclosed for filing on behalf of BellSouth Telecommunications, Inc. and ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom are an original and fifteen copies of the Joint Motion of BellSouth and ITC for Extension of Time for Supplemental Briefs in the above referenced docket.

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 yours,



Floyd R. Self

FRS/amb
Enclosures

DOCUMENT NUMBER-DATE

08960 AUG 17 04

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of unresolved issues in negotiation of interconnection agreement with BellSouth Telecommunications, Inc. by ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom.

Docket No. 030137-TP
Dated: August 17, 2004

**JOINT MOTION OF BELLSOUTH AND ITC
FOR EXTENSION OF TIME FOR SUPPLEMENTAL BRIEFS**

BellSouth Telecommunications, Inc. ("BellSouth") and ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom (hereinafter "ITC") (hereinafter, collectively, "Joint Movants"), pursuant to Rule 28-106.204, Fla. Admin. Code, hereby move the Florida Public Service Commission (hereinafter "Commission") to amend Order No. PSC-04-0784-PCO-TP to permit the parties additional time to address the FCC's interim UNE rules in the supplemental briefs now due Friday, August 20, 2004, and as grounds therefore, the Joint Movants state:

1. By Order No. PSC-04-0784-PCO-TP, issued August 10, 2004, the Commission authorized the parties to submit supplemental briefs to "address the TRO, USTA II, the FCC's interim UNE rules, and the FCC's ongoing rulemaking proceeding." Order, at 2.


2. As of the date of filing this Motion, the FCC still has not issued its interim UNE rules. These rules have the potential to significantly impact the issues remaining for resolution in this proceeding. If the interim rules have not yet been issued at the time of the filing of the supplemental briefs on August 20th, the parties will be compelled to seek to further supplement such supplemental briefs since these rules are expected to materially impact the unresolved issues in this docket.

3. While the FCC interim UNE rules are expected to be issued very soon, the actual date such rules will be issued remains unknown. Thus, to fulfill the intent of Order No. PSC-04-0784-PCO-TP that such rules be addressed, based upon discussions with the Commission Staff the parties have agreed that the due date for such supplemental briefs should be 20 days after the release of the FCC's order noticing such adoption. This 20-day period would give the parties sufficient time to obtain, read, analyze, and address the impact of such rules on this proceeding.

WHEREFORE, ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom and BellSouth Telecommunications, Inc. respectfully request that the Commission amend Order No. PSC-04-0784-PCO-TP to extend the deadline for the submission of supplemental briefs to be 20 days from the date of the FCC's order adopting such interim UNE rules.

Respectfully submitted,

ITC^DELTA COM COMMUNICATIONS, INC.
d/b/a ITC^DELTA COM

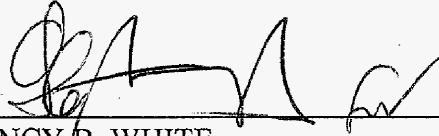


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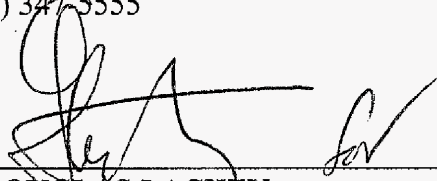
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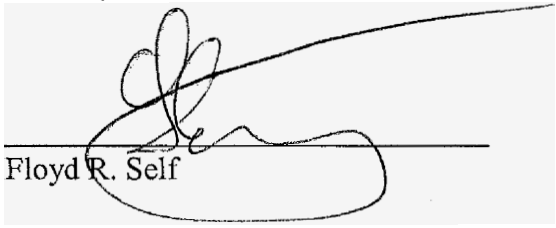
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following parties by Hand Delivery (*), and/or U. S. Mail this 17th day of August, 2004.

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