

ORIGINAL

Matilda Sanders

From: Slaughter, Brenda [Brenda.Slaughter@BELLSOUTH.COM]
 Sent: Thursday, September 02, 2004 12:20 PM
 To: Filings@psc.state.fl.us
 Cc: Shore, Andrew; Linda Hobbs; Fatool, Vicki; Holland, Robyn P; Nancy Sims; Bixler, Micheale; Peters, Evelyn
 Subject: Docket 030137-TP
 Importance: High

- A. Brenda Slaughter
 Legal Secretary for Andrew D. Shore
 BellSouth Telecommunications, Inc.
 c/o Nancy Sims
 150 South Monroe, Rm. 400
 Tallahassee, FL 32301-1558
 (404) 335-0714
brenda.slaughter@bellsouth.com
- B. Docket No. 030137-TP: 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
- C. BellSouth Telecommunications, Inc.
 on behalf of Andrew D. Shore
- D. 5 pages total
- E. Joint Motion for Extension of Time on behalf of BellSouth Telecommunications, Inc. and ITC^DeltaCom

Brenda Slaughter (sent on behalf of Andrew D. Shore)
 BellSouth Telecommunications, Inc.
 Suite 4300 - Legal Department
 675 W. Peachtree Street
 Atlanta, GA 30375-0001
 Phone: (404) 335-0714

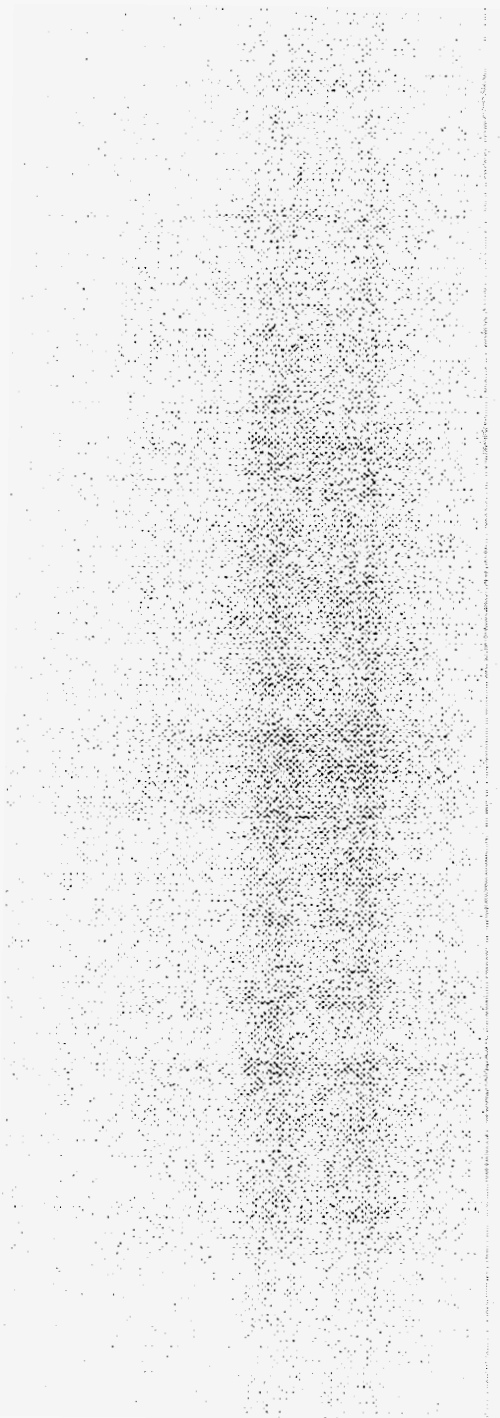
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ANDREW D. SHORE
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0765

September 2, 2004

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

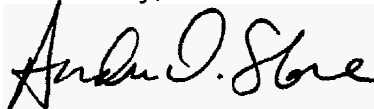
Re: Docket No. 030137-TP (ITC^DeltaCom)

Dear Ms. Bayó:

Enclosed is a Joint Motion for Extension of Time on behalf of BellSouth Telecommunications, Inc. and ITC^DeltaCom Communications, Inc., which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Andrew D. Shore

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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CERTIFICATE OF SERVICE
Docket No. 030137-TP


I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and First Class U.S. Mail this 2nd day of September, 2004 to the following:

Patricia Christensen
Adam Teitzman
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. 850-413-6248
Tel. No. 850-413-6175
pchriste@psc.state.fl.us
ateitzma@psc.state.fl.us

Floyd R. Self
Norman H. Horton, Jr.
Messer, Caparello & Self. P.A.
P.O. Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Attys. for ITC^DeltaCom
fself@lawfla.com

David L. Adelman, Esq.
Charles B. Jones, III, Esq.
Sutherland, Asbill & Brennan LLP
999 Peachtree Street, N.E.
Atlanta, GA 30309
Tel. No. (404) 853-8000
Fax. No. (404) 853-8806
Attys. for ITC^DeltaCom
djadelman@sablaw.com
cbjones@sablaw.com

Nanette S. Edwards, Esq.
Regulatory Attorney
ITC^DeltaCom
700 Blvd. South, Suite 101
Huntsville, AL 35802
Tel. No. (256) 650-3957
Fax. No. (256) 650-3852
nedwards@itcdeltacom.com


Andrew D. Shore

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) Docket No.: 030137-TP
 Communications, Inc. d/b/a ITC^DeltaCom)
 _____) Filed: September 2, 2004

JOINT MOTION OF BELLSOUTH AND ITC FOR ADDITIONAL 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-04-0826-PCO-TP to permit the parties additional time to address the FCC's interim UNE rules in the supplemental briefs now due September 9, 2004, and as grounds therefore, the Joint Movants state:

1. By Order No. PSC-04-0826-PCO-TP, issued August 23, 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" within 20 days following issuance of the FCC's interim rules.
2. The FCC issued its rules on Friday August 20, 2004. Accordingly, supplemental briefs are now due on September 9, 2004.
3. Because of previously scheduled vacation by BellSouth's attorney beginning on the date the rules were issued, counsel's first opportunity to review the interim rules was on Monday, August 30, 2004. Also, BellSouth's counsel has other

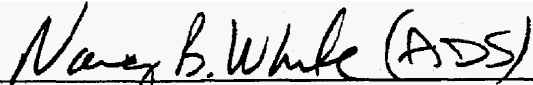
deadlines between now and September 9, 2004 that would make it extremely difficult for him to prepare and file a supplemental brief by September 9.

4. BellSouth's counsel consulted with ITC's counsel regarding an additional short extension, and ITC proposed September 23. The parties agree that is a reasonable deadline under the circumstances.

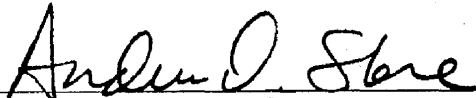
WHEREFORE, BellSouth Telecommunications, Inc. and ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom respectfully request that the Commission amend Order No. PSC-04-0826-PCO-TP to extend the deadline for the submission of supplemental briefs to September 23, 2004.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
c/o Nancy H. Sims
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558



R. DOUGLAS LACKEY
ANDREW D. SHORE
Suite 4300
675 W. Peachtree Street, NE
Atlanta, GA 30375
(404) 335-0765

ITC^DELTACOM COMMUNICATIONS, INC.
d/b/a ITC^DELTACOM

Floyd R. Self (by ADS w/permission)

Floyd R. Self, Esq.
MESSER, CAPARELLO & SELF, P. A.
Post Office Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720

Nanette S. Edwards, Esq.
ITC^DeltaCom Communications, Inc.
4092 South Memorial Parkway
Huntsville, AL 35802-4343

David I. Adelman, Esq.
Charles B. Jones, III, Esq.
SUTHERLAND ASBILL & BRENNAN LLP
999 Peachtree Street, NE
Atlanta, GA 30309
(404) 853-8000

548886