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September 2, 2004

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Mrs. Blanca S. Bayó
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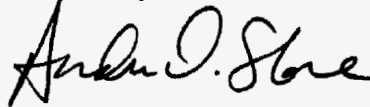
Re: Docket No. 030137-TP (ITC^DeltaCom)

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

- CMP _____
- COM _____ cc: All Parties of Record
- CTR _____ Marshall M. Criser III
- ECR _____ R. Douglas Lackey
- GCL _____ Nancy B. White
- OPC _____
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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:

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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 BELL SOUTH 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.



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