

ORIGINAL

Matilda Sanders

From: Slaughter, Brenda [Brenda.Slaughter@BellSouth.COM]
Sent: Wednesday, February 16, 2005 4:08 PM
To: Filings@psc.state.fl.us
Cc: Meza, James; Vicki Gordon Kaufman; Linda Hobbs; Holland, Robyn P; Nancy Sims; Bixler, Micheale
Subject: Docket 041114-TP Joint Motion
Importance: High
Attachments: 041114-TP Joint Motion for Ext Staff Third.pdf

- A. Brenda Slaughter
 Legal Secretary for James Meza III
 BellSouth Telecommunications, Inc.
 c/o Nancy Sims
 150 South Monroe, Rm. 400
 Tallahassee, Florida 32301-1558
 (404) 335-0714
brenda.slaughter@bellsouth.com
- B. Docket No. 041114-TP: Complaint of XO Florida, Inc. Against BellSouth Telecommunications, Inc. for Refusal to Convert Circuits to UNEs and for Expedited Processing
- C. BellSouth Telecommunications, Inc.
 on behalf of James Meza III
- D. 4 pages total
- E. Joint Motion of Time for BellSouth and XO to Respond to Staff's Third Set of Interrogatories and Third Requests for Production to Parties

Brenda Slaughter (on behalf of James Meza III)
 BellSouth Telecommunications, Inc.
 Suite 4300 - Legal Department

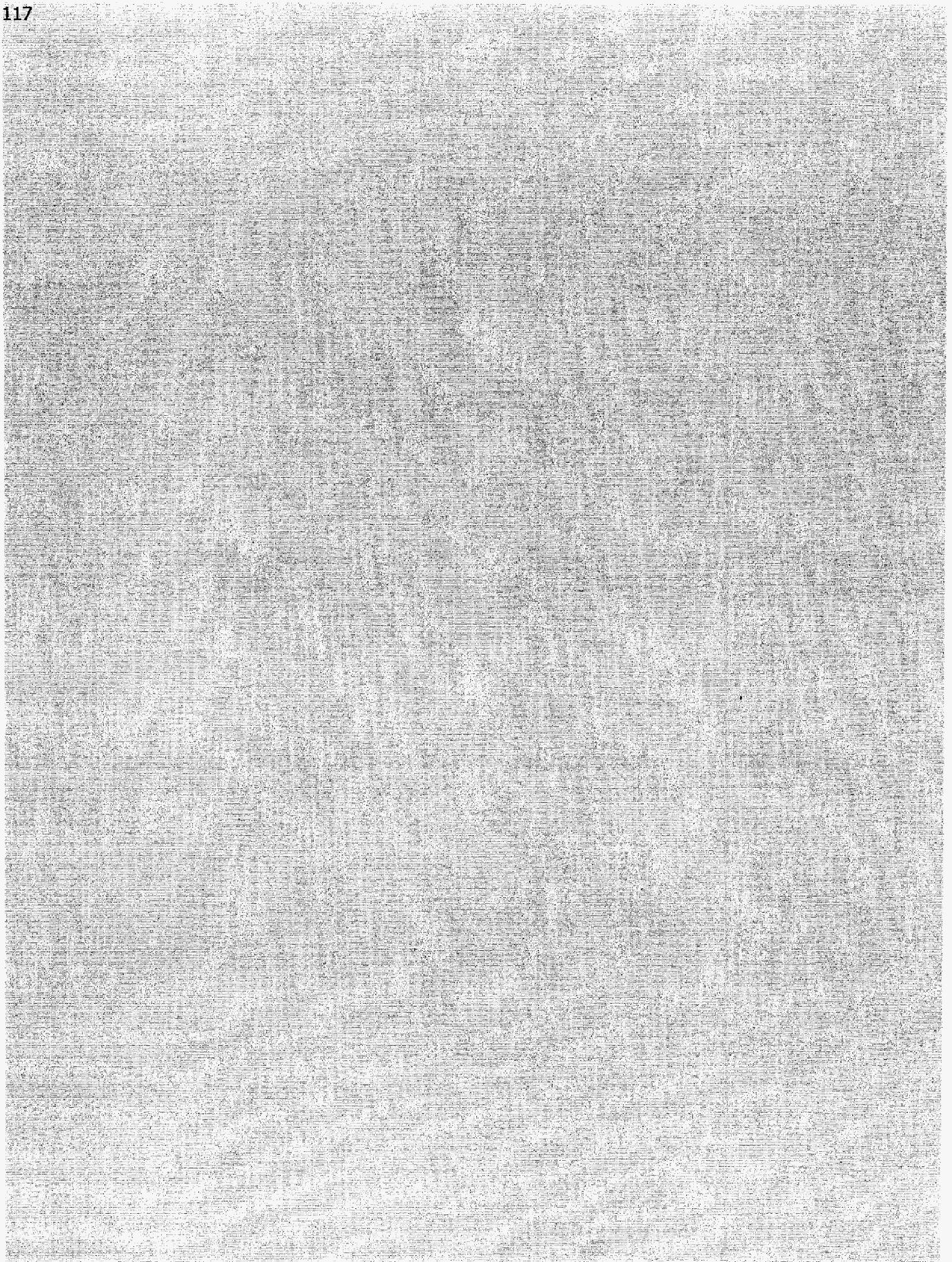
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TH Kim P.
 2/16/2005

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Legal Department

JAMES MEZA III
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0769

February 16, 2005

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

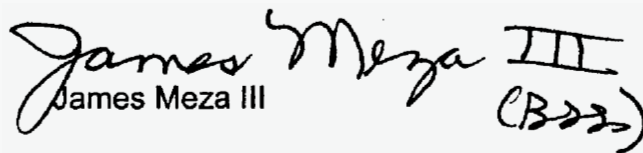
**Re: 041114-TP – Complaint of XO Florida, Inc. Against
BellSouth Telecommunications, Inc. for Refusal to Convert
Circuits to UNEs and for Expedited Processing**

Dear Ms. Bayó:

Enclosed is Joint Motion for Extension of Time on behalf of BellSouth Telecommunications, Inc. and XO, 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,


James Meza III
(B22)

Enclosures

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

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

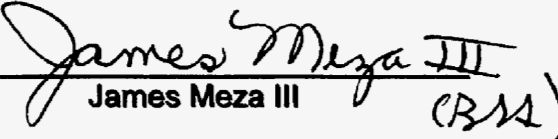
**CERTIFICATE OF SERVICE
DOCKET NO. 041114-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Federal Express this 16th day of February, 2005 to the following:

Jason Rojas
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6179
irojas@psc.state.fl.us

Vicki Gordon Kaufman (+)
McWhirter Reeves
Davidson Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
vkaufman@mac-law.com
Represents XO

Dana Shaffer (+)
XO Florida, Inc.
VP, Regulatory Counsel
105 Molloy Street, Ste. 300
Nashville, TN 37201
Tel. No. (615) 777-7700
Fax. No. (615) 850-0343
dana.shaffer@xo.com


James Meza III (BSA)

(+) SIGNED PROTECTIVE AGREEMENT

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of XO Florida, Inc.) Docket No.: 041114-TP
Against BellSouth Telecommunications, Inc. for)
Refusal to Convert Circuits to UNEs and for)
Expedited Processing)
_____) Filed: February 16, 2005

JOINT MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth") and XO Florida, Inc. ("XO"), pursuant to Rule 28-106.204(5), Florida Administrative Code, jointly request that the Florida Public Service Commission ("Commission") grant them a 6 day extension of time or until February 23, 2005 in which to file Responses to Florida Public Service Commission Staff's ("Staff") Third Set of Interrogatories and Third Request For Production to the parties. In support of this motion, the parties state the following:

1. Staff served its Third Set of Interrogatories and Third Request For Production on BellSouth and XO on January 28, 2005. Pursuant to Order No. PSC-04-1147-PCO-TP ("Procedural Order"), objections and responses to this discovery are due February 17, 2005.
2. BellSouth and XO request this extension of time because depositions are scheduled to take place on February 17, 2005.
3. The parties have notified Staff of this request for the extension of time and Staff has agreed to the extension provided the parties e-mail or hand deliver the discovery at the same time as filing (or as soon as possible).

DOCUMENT NUMBER-DATE

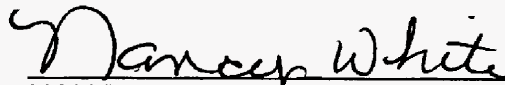
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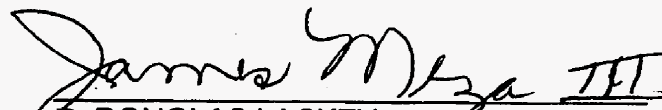
FPSC-COMMISSION CLERK

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Commission grant BellSouth and XO a 6 day extension of time in which to file the aforementioned objections and responses.

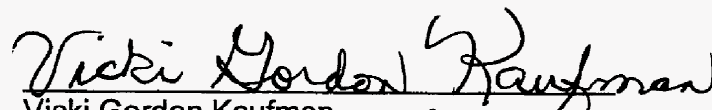
Respectfully submitted this 16th day of February, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.


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


R. DOUGLAS LACKEY (BSB)
JAMES MEZA III
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0769

COUNSEL FOR XO


Vicki Gordon Kaufman (by permission BSB)
McWhirter Reeves
Davidson Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525