

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Compliance investigation of 9278
Communications, Inc. for apparent violation of
Sections 364.02 and 364.04, Florida Statutes. | DOCKET NO. 030696-TI
| DATED: MARCH 17, 2005

STAFF'S RESPONSE TO AMENDED REQUEST FOR EXTENSION OF TIME

Staff submits this Response to the Amended Request for Extension of Time ("Request") filed by 9278 Communications, Inc. ("9278"). The Florida Public Service Commission ("Commission") should direct 9278 to promptly respond to Staff's Discovery Requests, as the discovery responses sought by staff are now grossly overdue.

1. On February 25, 2005, 9278 Communications, Inc. requested additional time to file responses to discovery propounded by Staff in this docket. On March 14, 2005, 9278 amended this request to request an extension to March 18, 2005, in which to respond.

2. Counsel for 9278 contacted Staff counsel regarding both this Request and the initial Request and Staff counsel has no objection to either request. However, in further communication with counsel for 9278 it has become apparent that further delays are anticipated.

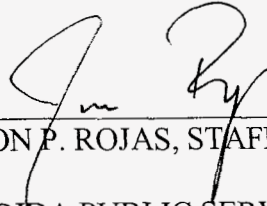
3. Staff would like to note that the discovery responses sought after are now painfully overdue and any further delay would be damaging to Staff's case in this proceeding. To date, 9278 has refused to provide answers to any of Staff's discovery requests, any further delay would be a blatant violation of the Order Establishing Procedure and exceedingly detrimental to the efficient and timely handling of this matter. Staff would request that the Commission direct 9278 to promptly respond to Staff's Discovery Requests no later than the close of business on March 18, 2005.

DOCUMENT NUMBER - DATE

02611 MAR 17 05

FPSC-COMMISSION CLERK

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jason P. Rojas", is written over a horizontal line.

JASON P. ROJAS, STAFF COUNSEL

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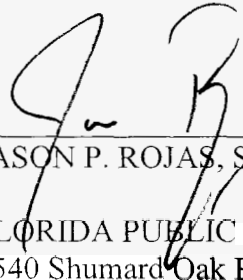
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of STAFF'S RESPONSE TO AMENDED REQUEST FOR EXTENSION OF TIME has been served by U.S. Mail and via Electronic Mail, to Norman Horton, Jr. Esquire and Albert T. Gimbel, Esquire, Messer Law Firm, Post Office Box 1876, Tallahassee, FL 32302, on behalf of 9278 Communications, Inc., and the following sent by U.S. Mail this 17th day of March, 2005:

9278 Communications, Inc.
Sajid Kapadia/Craig Libson
1942 Williamsbridge Road
Bronx, NY 10461

Messer Law Firm
Norman Horton, Jr./Albert T. Gimbel
P.O. Box 1876
Tallahassee, FL 32302

Respectfully submitted,



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