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05 MAY 23 AM 9:30  
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COMMISSION  
CLERK

May 20, 2005

Meredith Mays, Esq.  
Senior Regulatory Counsel  
BellSouth Telecommunications, Inc.  
150 South Monroe Street/ Room 400  
Tallahassee, FL 32399-0850

Ms. Blanca Bayo  
Comm. Clerk & Adm. Services.  
Florida Public Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 21288-0850

Carris (Lee) Fordham, Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Nancy B. White- C/O  
Nancy H. Sims  
150 Monroe Street  
Suite 400  
Tallahassee, FL 32301

In Re: Dispute Regarding Embedded Base Between Saturn Communications Ser. Inv. d/b/a  
STS Telecom and Bellsouth Telecom Inc.

Enclosed are an original and fifteen copies of Saturn Telecommunications, Inc.'s Motion for Extension of Time to File Response to Bellsouth Motion to Dismiss, STS Emergency Petition to Require Bellsouth to Allow Additional Lines, and Locations to Embedded Base, and for Expedited Relief.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

GMP \_\_\_\_\_

COM \_\_\_\_\_ Sincerely

CTR \_\_\_\_\_ 

ECR \_\_\_\_\_ Alan Gold, Esquire

GCL \_\_\_\_\_ James L. Parado Esquire

OPC \_\_\_\_\_ Enclosures:

MMS \_\_\_\_\_ cc: Meredith Mays

IRCA \_\_\_\_\_ Nancy B. White

SCR \_\_\_\_\_ Carris (Lee) Forham

SEC \_\_\_\_\_ Blanca Bayo

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04977 MAY 23 08

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Dispute Regarding Embedded Base  
Between Saturn Telecommunication  
Services, Inc. d/b/a STS Telecom  
and BellSouth Telecommunications, Inc.

DOCKET NUMBER  
050297

Date Filed: May 20, 2005

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO BELLSOUTH'S  
MOTION TO DISMISS STS' EMERGENCY PETITION TO REQUIRE BELLSOUTH  
TO ALLOW ADDITIONAL LINES AND LOCATIONS TO EMBEDDED BASE, AND  
FOR EXPEDITED RELIEF**

The Petitioner, SATURN TELECOMMUNICATION SERVICES, INC. d/b/a STS Telecom ("STS"), by and through its undersigned counsel, and requests an extension of time through and including June 3, 2005, in which to file its response to BellSouth Telecommunication Inc.'s ("BellSouth") "Motion To Dismiss STS' Emergency Petition To Require BellSouth To Allow Additional Lines and Locations To Embedded Base and for Expedited Relief" , and in support thereof states as follows:

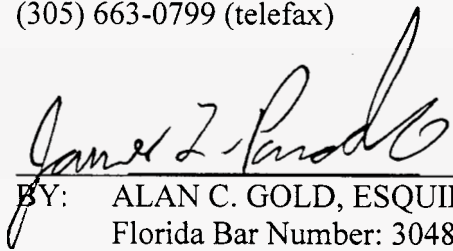
1. STS and BellSouth are attempting to resolve the issues raised before the Florida Public Service Commission in STS's Petition To Require BellSouth To Allow Additional Lines and Locations To Embedded Base and for Expedited Relief.
2. To avoid additional expense during the pendency of settlement negotiations, it would be in the best interest of the parties to extend the time to respond to the Motion To Dismiss for a brief period of time until June 3, 2005.
3. STS's counsel has spoken to Counsel for BellSouth regarding an extension of time and they consent to the requested extension of time.

DOCUMENT NUMBER-DATE  
04977 MAY 23 05  
FPSC-COMMISSION CLERK

WHEREFORE, Petitioner, STS, by and through the undersigned Counsel, requests that this Honorable Commission enter its Order granting Petitioner and extension until June 3, 2005 to file its Response to BellSouth's "Motion To Dismiss Petition To Require BellSouth To Allow Additional Lines and Locations To Embedded Base and for Expedited Relief".

Respectfully submitted,

ALAN C. GOLD, P.A.  
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BY: ALAN C. GOLD, ESQUIRE  
Florida Bar Number: 304875  
JAMES L. PARADO, ESQUIRE  
Florida Bar Number: 0580910

**CERTIFICATE OF SERVICE**

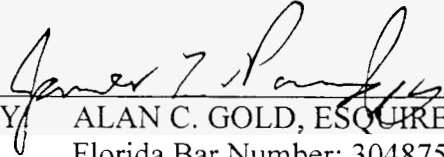
I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed via Federal Express overnight on this 20th day of May 2005, to:

Meredith Mays, Esq.  
Senior Regulatory Counsel  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, FL 32301-1556

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Ms. Blanca Bayo, Director  
Commission Clerk and Administrative Services  
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