

ORIGINAL

Matilda Sanders

From: Fatool, Vicki [Vicki.Fatool@BellSouth.COM]
Sent: Thursday, June 09, 2005 12:11 PM
To: Filings@psc.state.fl.us
Subject: 050257-TL BellSouth's Motion for Extension of Time
Importance: High
Attachments: 050257-T.pdf

A. Vicki Fatool
Legal Secretary to Nancy B. White
BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
(305) 347-5560
vicki.fatool@bellsouth.com

B. Docket No. 050257-TP

Complaint by BellSouth Telecommunications, Inc., Regarding the Operation of a
Telecommunications Company by Miami-Dade County in Violation of Florida Statutes
and Commission Rules

C. BellSouth Telecommunications, Inc.
on behalf of Nancy B. White

D. 4 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc.'s Motion for Extension of Time

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<<050257-T.pdf>>

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SEC
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6/9/2005

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Legal Department

Nancy B. White
General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

June 9, 2005

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

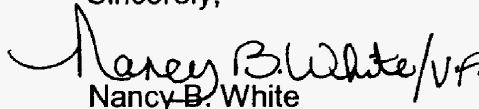
**Re: Docket No. 050257-TL: Complaint by BellSouth
Telecommunications, Inc., Regarding the Operation of a
Telecommunications Company by Miami-Dade County in Violation of
Florida Statutes and Commission Rules**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Motion for Extension of Time, 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,


Nancy B. White

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

DOCUMENT NUMBER-DATE

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**CERTIFICATE OF SERVICE
Docket No. 050257-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 9th day of June, 2005 to the following:

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Staff Counsel
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Commission
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Nancy B. White

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth Tele-) Docket No. 050257-TL
Communications, Inc., Regarding)
The Operation of a Telecommunications)
Company by Miami-Dade County in)
Violation of Florida Statutes and)
Commission Rules)
_____) Dated: June 9, 2005

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR EXTENSION OF TIME**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.204(5), Florida Administrative Code, requests that the Florida Public Service Commission ("Commission") grant an extension of time until June 20, 2005, in which to respond to Miami-Dade County's (the "County") Motion to Dismiss ("Motion") in the above captioned docket. In support of this motion, BellSouth states the following:

1. On June 1, 2005, the County filed its Motion and served the Motion on BellSouth via facsimile on that same day after 5:00 p.m. BellSouth first received a copy of this Motion on June 2, 2005. Accordingly, under Rules 28-106.204(5) and 28-106.103, Florida Administrative Code, BellSouth's response is due on June 9, 2005, seven (7) days from service (not counting June 1st since it was sent after normal business hours).

2. Because of other commitments, BellSouth needs additional time to adequately respond to the Motion.

3. The County would not be prejudiced by the requested eleven (11) day extension of time and the Commission would benefit from receiving an informed response to the Motion.

4. Counsel for the County agreed to said extension of time.

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5. On June 3, 2005, BellSouth filed with the Commission, a letter confirming the County's agreement to said extension of time.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that the Commission grant it an extension of time until June 20, 2005 in which to respond to the Motion filed by the County.

Respectfully submitted this 9th day of June, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.


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