

ORIGINAL

Matilda Sanders

From: Fatool, Vicki [Vicki.Fatool@BellSouth.COM]
Sent: Monday, December 05, 2005 3:09 PM
To: Filings@psc.state.fl.us
Subject: 050881-TP Agreed Motion for Extension of Time
Importance: High
Attachments: 050881-T.pdf

- A. Vicki Fatool
 Legal Secretary to Nancy B. White and Manuel A. Gurdian
 BellSouth Telecommunications, Inc.
 150 South Monroe Street
 Suite 400
 Tallahassee, Florida 32301
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- B. Docket No. 050881-TP: Complaint of DIECA Communications, Inc. d/b/a Covad Communications Company against BellSouth Telecommunications, Inc.

- C. BellSouth Telecommunications, Inc.
 on behalf of Manuel A. Gurdian

- D. 4 pages total (includes Bayo Letter, certificate of service and pleading)

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

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FDCC COMMISSION CLERK

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Legal Department

MANUEL A. GURDIAN
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BellSouth Telecommunications, Inc.
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December 5, 2005

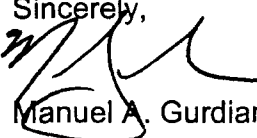
Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Docket No. 050881-TP: Complaint of DIECA Communications, Inc. d/b/a Covad
Communications Company against BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Agreed 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,

Manuel A. Gurdian

Enclosures

cc: All Parties of Record
Jerry Hendrix
R. Douglas Lackey
Nancy B. White

DOCUMENT NUMBER-DATE

11431 DEC -5 8

**CERTIFICATE OF SERVICE
DOCKET NO. 050881-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 5th day of December, 2005 to the
following:

Beth Keating
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Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of DIECA Communications) Docket No. 050881-TP
Inc. d/b/a Covad Communications Company)
against BellSouth Telecommunications, Inc.)
Dated: December 5, 2005

AGREED MOTION FOR EXTENSION OF TIME

On behalf of BellSouth Telecommunications, Inc. ("BellSouth") and DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad"), BellSouth, pursuant to Rule 28-106.204(5), Florida Administrative Code, hereby requests that the Florida Public Service Commission ("Commission") grant it a thirty (30) day extension of time or until January 6, 2006, in which to respond to Covad's Complaint filed against BellSouth in the above captioned docket. In support of this motion, BellSouth states the following:

- 1. On or about November 17, 2005, Covad filed, with the Commission, its Complaint against BellSouth for the alleged breach of an interconnection agreement.
2. On or about November 17, 2005, Covad also filed Complaints with the Georgia Public Service Commission ("GPSC") and the Federal Communications Commission ("FCC") alleging similar allegations to the Complaint filed in Florida.
3. On or about November 17, 2005, Covad filed a Motion for Stay Pending FCC Action with the Commission. In its Motion, Covad seeks to stay this proceeding pending resolution of its concurrently filed Complaint before the FCC.
4. BellSouth agrees with Covad that a stay should be entered and that a stay would allow the Commission to conserve its limited judicial and administrative resources, as the FCC may resolve some or all of the issues in the Complaint without need of any further action by this Commission.

5. To date, Covad's Motion for Stay has not been ruled upon by the Commission.

6. BellSouth's response to the Complaint is due on or about December 7, 2005.

7. BellSouth requests an extension of time in order to allow the Commission an opportunity to stay the instant action in lieu of BellSouth filing a responsive pleading.

8. Counsel for Covad has agreed to BellSouth's request for a thirty (30) day extension of time to file a responsive pleading to the Complaint.

9. No party will be prejudiced by the requested extension of time.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that the Commission grant it a thirty (30) day extension of time or until January 6, 2006 in which to file a responsive pleading to Covad's Complaint.

Respectfully submitted this 5th day of December, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.



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