

ORIGINAL

Matilda Sanders

From: Slaughter, Brenda [Brenda.Slaughter@BellSouth.COM]
Sent: Wednesday, December 14, 2005 3:32 PM
To: Filings@psc.state.fl.us
Cc: Meza, James; Floyd Self; Donna McNulty; Dulaney O'Roark; Kira Scott; Fatool, Vicki; Linda Hobbs; Holland, Robyn P; Nancy Sims; Bixler, Micheale
Subject: Docket 050419-TP
Importance: High
Attachments: 050419-TP Joint Motion Continuance.pdf

- A. Brenda Slaughter
 Legal Secretary to James Meza III
 BellSouth Telecommunications, Inc.
 150 South Monroe Street
 Suite 400
 Tallahassee, Florida 32301
 (404) 335-0714
brenda.slaughter@bellsouth.com
- B. Docket No.: 050419-TP Petition by MCImetro Access Transmission Services LLC for arbitration of certain terms and Conditions of proposed interconnection agreement with BellSouth Telecommunications, Inc.
- C. BellSouth Telecommunications, Inc.
 on behalf of James Meza, III
- D. 5 pages total (includes letter, certificate of service and pleading)
- E. Joint Motion for Continuance of Hearing and Pre-Hearing Deadlines on behalf of BellSouth Telecommunications, Inc.
 and MCImetro Access Transmission Services LLC

CMP <<050419-TP Joint Motion Continuance.pdf>>

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James Meza III
Senior Regulatory Counsel

ORIGINAL

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

December 14, 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

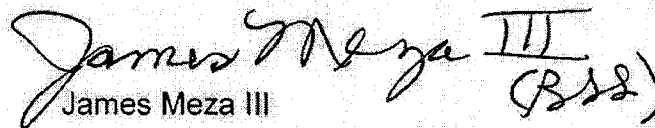
Re: **Docket No. 050419-TP**
**In Re: Petition of MCImetro Access Transmission Services, LLC
For Arbitration of Certain Terms and Conditions of Proposed
Agreement with BellSouth Telecommunications, Inc. Concerning
Interconnection and Resale Under the Telecommunications
Act of 1996**

Dear Ms. Bayó:

Enclosed is a Joint Motion for Continuance of Hearing and Pre-Hearing
Deadlines on behalf of BellSouth Telecommunications, Inc. and MCImetro Access
Transmission Services LLC, which we ask that you file in the captioned docket.

A copy has been served to all parties of record.

Sincerely,


James Meza III (BSS)

Enclosures

cc: All parties of record
Jerry D. Hendrix
Nancy B. White
R. Douglas Lackey

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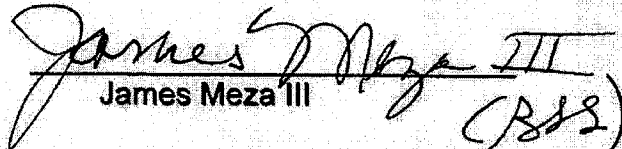
**CERTIFICATE OF SERVICE
DOCKET NO. 050419-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via First Class U.S. Mail and Electronic Mail Mail this 14th day of December, 2005 to the following:

Kira Scott
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
kscott@psc.state.fl.us

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Counsel for MCI


James Meza III
(BSS)

Donna Canzano McNulty
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donna.mcnulty@mci.com

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCImetro Access Transmission)
Services LLC for arbitration of certain terms and)
Conditions of proposed interconnection agreement)
With BellSouth Telecommunications, Inc.)

Docket No. 050419-TP

Filed: December 14, 2005

**JOINT MOTION FOR CONTINUANCE OF HEARING
AND PRE-HEARING DEADLINES**

BellSouth Telecommunications, Inc. ("BellSouth") and MCImetro Access Transmission Services, LLC ("MCI") jointly request that the Florida Public Service Commission continue the hearing of this matter and all pre-hearing deadlines and filing requirements for the following reasons:

1. The hearing of this matter is currently scheduled for January 24-25, 2006. The parties jointly request a continuance of this hearing date as well as all pre-hearing deadlines and filing requirements because of the pending merger between MCI and Verizon, which is expected to close soon. Upon completion of the merger, MCI will need to assess the contract language in dispute and evaluate whether any of its positions on the issues in this case should be modified. The extension will allow MCI to identify any such instances and then inform BellSouth and the Commission of the modifications.

2. As part of MCI's evaluation, it intends to review whether it may be possible to resolve issues on which the parties previously had reached impasse. In this connection, the parties have set aside four days to have face-to-face negotiations during the continuance time period.

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3. This request is made jointly and thus no party would be prejudiced. With a continuance, moreover, the parties hope to conserve the Commission's and the parties' time and resources by using the extension period to negotiate the resolution of several issues and thus remove them from the arbitration.

4. Accordingly, the parties jointly propose that the hearing be rescheduled for May 22 and 23, 2006, and respectfully request that if the Commission's schedule permits, that the Commission set the remaining deadlines and filings as follows:

March 3, 2006	Parties to file a revised matrix with the Commission to identify any modified or new positions.
March 17, 2006	Parties to file Supplemental Testimony to address any modified or new positions.
May 1, 2006	Parties to file prehearing statements.
May 8, 2006	Prehearing Conference
May 22-23, 2006	Hearing.
June 29, 2006	Parties to file Post-Hearing Brief.

WHEREFORE, BellSouth and MCI respectfully request that the Commission continue the hearing currently scheduled for January 24-25, 2006 to May 22 and 23, 2006 and that the Commission reset all remaining pre-hearing deadlines and filings. In addition, BellSouth and MCI request that the Commission allow the parties to file a revised matrix on March 3, 2006 and Supplemental Testimony on March 17, 2006 for the purpose of identifying any modified or new positions as described more fully herein.

Respectfully submitted this 14th day of December, 2005.

BellSouth Telecommunications, Inc.

MCImetro Access Transmission
Services LLC

James Meza III

on behalf of
NANCY B. WHITE (B22)
c/o Nancy H. Sims
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James Meza III

on behalf of
Floyd Self (B22)
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