James Meza III Senior Regulatory Counsel

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

February 14, 2006

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. 060068-TP

Complaint of National Telecom & Broadband Services, LLC against BellSouth Telecommunications, Inc. for Breach of Interconnection Agreement and Petition for Emergency Order Restoring Service

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Unopposed Motion for Extension of Time to File an Answer, which we ask that you file in the captioned docket.

A copy has been served to all parties of record.

Sincerely,

James Meza III (BS)

Enclosures

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

## CERTIFICATE OF SERVICE DOCKET NO. 060068-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

First Class U.S. Mail and Electronic Mail this 14th day of February, 2006 to the

#### following:

Patrick K. Wiggins
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413pwiggins@psc.state.fl.us

National Telecom & Broadband Services, LLC Mark Mansour 2626 E. Oakland Boulevard, Suite 400 Ft. Lauderdale, FL 33306 Tel. No. (954) 616-5612 Fax No. (954) 771-7608 mmansour@national-tel.com

Beth Salak Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Tel. No. (850) 413-6600

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond
White & Krasker, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
vkaufman@moylelaw.com
Represents National Telecom

James Meza III

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of National Telecom & Broadband	)	
Services, LLC against	)	
BellSouth Telecommunications, Inc. for	)	Docket No.: 060068-TP
Breach of Interconnection Agreement and	)	
Petition for Emergency Order Restoring Service	)	Filed: February 14, 2006
	)	

#### BELLSOUTH TELECOMMUNICATIONS, INC.'S UNOPPOSED MOTION FOR <u>EXTENSION OF TIME TO FILE AN ANSWER TO COMPLAINT</u>

BellSouth Telecommunications, Inc. ("BellSouth") hereby files this Unopposed Motion for Extension of Time to File an Answer to the Complaint of National Telecom & Broadband Services, LLC ("National Telecom") for Breach of Interconnection Agreement and Petition for Emergency Order Restoring Service (hereinafter the "Complaint"), and says:

- On January 26, 2006, National Telecom filed its Complaint against BellSouth.
   Consequently, BellSouth's Answer to the Complaint is due on February 14, 2006.
  - 2. The parties are discussing the allegations contained in the Complaint.
- 3. BellSouth seeks a thirty (30) day extension of time, through and including March 16, 2006, in which to file an Answer to the Complaint. Such an extension will give the parties time to perform a more in-depth review of the disputed charges in the Complaint.
- 4. BellSouth makes this timely request in good faith and no party will be prejudiced by the Commission granting this Motion. National Telecom has no objection to the requested relief.

WHEREFORE, BellSouth respectfully requests a thirty (30) day extension of time, through and including March 16, 2006, to file an Answer to the Complaint.

Respectfully submitted this 14th day of February 2006.

### BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

DOUGLAS LACKE

JAMES MEZA III

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0769