Dorothy Menasco

ORIGINAL

From:

Ann Bassett [abassett@lawfla.com]

Sent:

Thursday, February 16, 2006 4:13 PM

To:

Filings@psc.state.fl.us

Subject:

Docket 050581-TP

Attachments: 2006-02-16, 050581, Motion for Extention of Time to File Direct Testimony.pdf

The person responsible for this electronic filing is:

Floyd R. Self Messer, Caparello & Self, P.A. P.O. Box 1876 Tallahassee, FL 32302-1876 (850) 222-0720 fself@lawfla.com

The Docket No. is 050581-TP - Complaint of KMC Telecom III LLC and KMC Telecom V, Inc. against Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership for alleged failure to pay intrastate access charges pursuant to interconnection agreement and Sprint's tariffs, and for alleged violation of Section 364.16(3)(a), F.S.

This is being filed on behalf of KMC Telecom III LLC and KMC Telecom V, Inc. (collectively "KMC") and Sprint-Florida, Incorporated ("Sprint-FL") and Sprint Communications Company Limited Partnership ("Sprint LP")

Total Number of Pages is 4

KMC Telecom III LLC and KMC Telecom V, Inc. (collectively "KMC") and Sprint-Florida, Incorporated ("Sprint-FL") and Sprint Communications Company Limited Partnership's ("Sprint LP") Joint Motion for Extension of Time to File Direct Testimony

Ann Bassett

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Messer, Caparello & Self

A Professional Association

Post Office Box 1876 Tallahassee, Florida 32302-1876 Internet: www.lawfla.com

February 16, 2006

BY ELECTRONIC FILING

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re:

Docket No. 050581-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of KMC Telecom III LLC and KMC Telecom V, Inc. (collectively "KMC") and Sprint-Florida, Incorporated ("Sprint-FL") and Sprint Communications Company Limited Partnership ("Sprint LP"), is an electronic version of a Joint Motion for Extension of Time to File Direct Testimony in the above referenced docket:

Thank you for your assistance with this filing.

Sincerely yours,

Floyd R. Self

FRS/amb Enclosures

cc.

Parties of Record



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of KMC Telecom III LLC and KMC Telecom V, Inc. against Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership for alleged failure to pay intrastate access charges pursuant to interconnection agreement and Sprint's tariffs, and for alleged violation of Section 364.16(3)(a), F.S.

Docket No. 050581-TP Filed: February 16, 2006

JOINT MOTION FOR EXTENSION OF TIME TO FILE DIRECT TESTIMONY

KMC Telecom III LLC and KMC Telecom V, Inc. (collectively "KMC") and Sprint-Florida, Incorporated ("Sprint-FL") and Sprint Communications Company Limited Partnership ("Sprint LP"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby move the Florida Public Service Commission (hereinafter "Commission") to extend the time direct testimony is due by one week to February 27, 2006, and as grounds therefore, KMC, Sprint-FL and Sprint LP state:

- 1. Commission Order No. PSC-06-0054-PCO-TP issued January 23, 2006, set the due date for direct testimony as February 20, 2006.
- 2. KMC, Sprint-FL, and Sprint LP are involved in discussions looking to a possible resolution of various issues between the parties. Although there is no guarantee that this docket will be settled by the parties, the additional week will enable the parties to have a better understanding as to whether a resolution of some or all the issues is possible and allow the parties to better focus their resources.
- 3. Seven additional days on the direct testimony will not materially or adversely impact the remaining schedule for this case. All other dates will remain unchanged.

DOCUMENT NUMBER-DATE

WHEREFORE, KMC, Sprint-FL, and Sprint LP respectfully request that Order No. PSC-06-0054-PCO-TP be amended to extend the deadline for submission of direct testimony through the close of business on Monday, February 27, 2005.

Respectfully submitted,

Floyd R. Self

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Attorneys for Sprint Communications Company

Limited Partnership

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail this 16th day of February, 2006

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