

ORIGINAL

Matilda Sanders

From: Sheffield, Glenda [Glenda.Sheffield@BellSouth.COM]
Sent: Friday, February 17, 2006 3:59 PM
To: Filings@psc.state.fl.us
Cc: Mays, Meredith; Linda Hobbs; Bixler, Micheale; Slaughter, Brenda ; Fatool, Vicki; Holland, Robyn P; Nancy Sims; William Atkinson; Adam Kupetsky; Adam Teitzman; Bill Magness; Charles Guyton; Dana Shaffer; De O'Roark; Donna McNulty; Floyd Self; Garrett Hargrave; Gene Watkins; John Heitmann; Jonathan Marashlian; Ken Hoffman; Marsha Rule; Martin McDonnell; Matthew Feil; Michael Barrett; Michael Gross; Norman Horton; Raymond Manasco; Steven Chaiken; Tony Mastando; Vicki Gordon Kaufman
Subject: Docket No. 041269-TP
Importance: High
Attachments: 041269-TPMotiontoAmendFilingDate.pdf

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 SCR _____
 SGA _____
 SEC 1
 OTH Kimp.

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B. Docket No. 041269-TP

Petition to Establish Generic Docket to Consider Amendments to Interconnection
 Agreements Resulting from Changes of Law

C. BellSouth Telecommunications, Inc.
 on behalf of Meredith Mays

D. 7 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc.'s Motion to Amend Filing Date

<<041269-TPMotiontoAmendFilingDate.pdf>>

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ORIGINAL

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February 17, 2006

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

Re: Docket No. 041269-TP

Dear Ms. Bayo:

Enclosed is BellSouth Telecommunications, Inc.'s Motion to Amend Filing Date
for Interconnection Agreement Amendments, 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,

Meredith Mays
Meredith Mays
(BMA)

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

DOCUMENT NUMBER-DATE
01419 FEB 17 06
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 041269-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Overnight Mail this 17th day of February, 2006 to the following:

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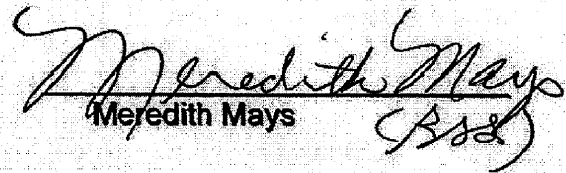
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Meredith Mays

(+) signed Protective Agreement
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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)
) Docket No. 041269-TP
Petition to Establish Generic Docket to)
Consider Amendments to Interconnection)
Agreements Resulting From Changes of Law) Filed: February 17, 2006

MOTION TO AMEND FILING DATE
FOR INTERCONNECTION AGREEMENT AMENDMENTS

1.

Pursuant to the Commission's February 7, 2006 decision in this docket, executed interconnection agreement amendments reflecting that decision must be filed with the Commission on February 27, 2006. BellSouth Telecommunications, Inc. ("BellSouth") requests the Commission modify that date to March 2, 2005.

2.

On February 17, 2006, Commission staff issued a recommendation that the Commission vacate its decision of issues 5, 13, 16-18, and 22(b); direct new staff members to review existing record and prepare new recommendation for de novo consideration. Staff also recommended that, if approved, the final order on non-vacated issues should be issued immediately and, relevant to this motion, that the Commission require filing of interconnection agreements and amendments compliant with decision on non-vacated issues or as a result of negotiation by 3/2/06.

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3.

BellSouth understands staff's recommendation may be addressed at the February 28, 2006 agenda session. Because staff's recommendation will not be considered until after the February 27, 2006 amendment deadline, BellSouth respectfully requests the extension sought herein so that it can coordinate with its customers and submit the appropriate amendments to the Commission.

4.

Due to the time constraints involved, BellSouth has not asked if parties of record have any objection to this motion. BellSouth contacted counsel for Covad Communications and asked, prior to the issuance of the staff recommendation, if Covad had any conceptual disagreement with a motion such as this. Covad was unwilling to submit a joint motion to the Commission. BellSouth will serve all parties of record with this motion.

5.

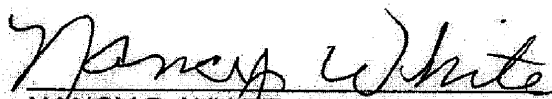
The modified amendment filing date would be consistent with the filing date recommended by staff and would still allow the parties time to meet the FCC's transitional deadline of March 10, 2006.

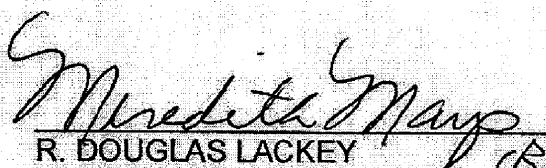
6.

No party will be prejudiced by the granting of this motion. BellSouth will work cooperatively with impacted CLECs in Florida to satisfy the March 2, 2006 filing date.

Respectfully submitted this 17th day of February, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.


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