

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

ORIGINAL

STEPHEN A. ECENIA
RICHARD M. ELLIS
KENNETH A. HOFFMAN
LORENA A. HOLLEY
MICHAEL G. MAIDA
MARTIN P. McDONNELL
J. STEPHEN MENTON

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

R. DAVID PRESCOTT
HAROLD F. X. PURNELL
MARSHA E. RULE
GARY R. RUTLEDGE
MAGGIE M. SCHULTZ
GOVERNMENTAL CONSULTANTS
PARSONS B. HEATH
MARGARET A. MENDUNI

February 27, 2006

Ms. Blanca S. Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

HAND DELIVERY

RECEIVED-PPSC
FEB 27 AM 9:54
COMMISSION
CLERK

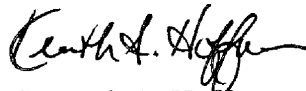
Re: Docket No. 060083-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket on behalf of Northeast Florida Telephone Company ("Northeast Florida") are the original and fifteen copies of Northeast Florida's Motion for Extension of Time to File Response to SSI's Motion to Dismiss or, In the Alternative, to Abate and Motion to Toll Time.

Please acknowledge receipt of these documents by stamping the extra copy of this letter filed and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,



Kenneth A. Hoffman

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC 1
- OTH Kim B

KAH/rl
Enclosures
NFTC\newcomplaint\bayo.feb 27 06 ltr

RECEIVED & FILED
M. Lockard
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

01664 FEB 27 06

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Northeast Florida Telephone)
Company d/b/a NEFCOM against South-)
eastern Services, Inc. for failure to pay)
intrastate access charges pursuant to)
Northeast Florida's tariffs and for violation)
of Section 364.16(3)(a), Florida Statutes.)
_____)

Docket No. 060083-TP

Filed: February 27, 2006

**NORTHEAST FLORIDA TELEPHONE COMPANY'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO SSI'S MOTION TO DISMISS OR,
IN THE ALTERNATIVE, TO ABATE AND
MOTION TO TOLL TIME**

Northeast Florida Telephone Company, d/b/a NEFCOM, by and through its undersigned counsel, hereby moves for an extension of time for the filing and service of its Response in Opposition to the Motion to Dismiss or, In the Alternative to Abate, filed by Southeastern Services, Inc. ("SSI"). Northeast Florida also requests that the time for the filing and service of its Response be tolled pending a ruling on this Motion. In support of these Motions, Northeast Florida state as follows:

1. On February 23, 2006, counsel for Northeast Florida received a copy of SSI's Motion to Dismiss or, In the Alternative, to Abate. Under Rules 28-106.103 and 28-106.204(1), Florida Administrative Code, Northeast Florida's Response to SSI's Motion would be due to be filed and served on March 6, 2006.

2. Counsel for Northeast Florida has a number of commitments over the next few weeks, including travel to and participation in depositions in connection with a case in Lee County, Florida, from February 28 through March 3, 2006, and preparation for and participation in depositions anticipated to be scheduled in Commission Docket Nos. 050119-TP and 050125-TP during the week

DOCUMENT NUMBER-DATE

01664 FEB 27 06

FPSC-COMMISSION CLERK

of March 13, 2006.

3. SSI's Motion is lengthy and raises a number of arguments that Northeast Florida intends to address in its Response. In light of the undersigned counsel's current commitments, additional time is necessary for the preparation of Northeast Florida's Response to SSI's Motion. In view of such current commitments, Northeast Florida's counsel requests an extension of time of fifteen days for the filing and service of Northeast Florida's Response to SSI's Motion.

4. Counsel for Northeast Florida has conferred with counsel for SSI and is authorized to represent that SSI has no objection to this Request.

WHEREFORE, for the foregoing reasons, Northeast Florida Telephone Company respectfully requests that the Prehearing Officer grant this Motion and authorize an extension of time up to and until March 21, 2006 for the filing and service of Northeast Florida's Response in Opposition to SSI's Motion to Dismiss or, in the Alternative to Abate, and that the current filing deadline of March 6, 2006 be tolled pending a ruling on this Motion.

Respectfully submitted,



Kenneth A. Hoffman, Esq.
Marsha E. Rule, Esq.
Martin P. McDonnell, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
215 S. Monroe Street, Ste. 420
P.O. Box 551
Tallahassee, FL 32301
850-681-6788 (Telephone)
860-681-6515 (Telecopier)

-- and --

Benjamin H. Dickens, Jr., Esq.
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, Northwest
Washington, DC 20037
(202) 828-5510 (Telephone)
(202) 828-5568 (Telecopier)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail to the following this 27th day of February, 2006:

Suzanne Fannon Summerlin, Esq.
Suzanne Fannon Summerlin, P.A.
2536 Capital Medical Boulevard
Tallahassee, FL 32309

C. Lee Fordham, Esq.
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



Kenneth A. Hoffman, Esq.