

**Matilda Sanders**

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**Sent:** Friday, March 31, 2006 2:47 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Culpepper, Robert; Fatool, Vicki; Slaughter, Brenda ; Linda Hobbs; Nancy Sims; Bixler, Micheale; Holland, Robyn P  
**Subject:** Florida Docket No. 041269-TP  
**Importance:** High  
**Attachments:** motion.pdf

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 OPC \_\_\_\_\_  
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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 Robert A. Culpepper

D. 6 pages total (includes letter, certificate of service and pleading)

E. Joint Motion for Extension of Time.

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March 31, 2006

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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Re: **Docket No. 041269-TP**  
**In re: Petition to Establish Generic Docket to Consider Amendments to  
Interconnection Agreements Resulting From Changes of Law**

Dear Ms. Bayo:

Enclosed is the Joint Motion for Extension of Time, 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,



Robert A. Culpepper

cc: All Parties of Record  
Jerry D. Hendrix

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**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 U. S. Mail this 31st day of March, 2006 to the following:

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**(+ )signed Protective Agreement  
(\* ) via FedEx**

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: March 31, 2006
_____	)	

JOINT MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"), NuVox Communications, Inc. (including the former NewSouth Communications Corp.), and Xspedius Communications, LLC (collectively referred to as "Joint Petitioners") jointly ask the Florida Public Service Commission ("Commission") for an extension of time in which to file executed interconnection agreements. In support of this Joint Motion, the parties state the following:

1. Pursuant to Order No. PSC-06-0172-FOF-TP, the parties were required to file executed amendments to the parties' current interconnection agreements or new interconnection agreements on March 10, 2006. The Commission previously granted an extension of this date for the filing of new interconnection agreements between BellSouth and the Joint Petitioners until March 31, 2006. However, the parties need additional time to negotiate and incorporate the Commission's decisions as to their unresolved issues and request that they be allowed to file the new agreements on April 14, 2006. The new agreements will incorporate, with respect to previously unresolved issues, the Commission's decisions in the Arbitration Docket (Docket No. 040130\_TP) and this docket.

2. Further, because the Joint Petitioners and BellSouth are both seeking this extension, no party will be prejudiced by this request for an extension. In addition, because the effective date of the new interconnection agreements will be March 11, 2006, the new

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agreements will have the same effective date as would amendments to the existing interconnection agreements.

3. By filing this Motion, none of the parties waive any arguments or rights they may have regarding application or the effectiveness of Order No. PSC-06-0172-FOF-TP on any party.

WHEREFORE, for the foregoing reasons, BellSouth and the Joint Petitioners respectfully request that this Commission grant them an extension until April 14, 2006 to file new interconnection agreements memorializing and incorporating the Commission's decision in the instant docket with respect to previously unresolved issues and the Arbitration Docket.

Respectfully submitted, this 31<sup>st</sup> day of March, 2006.

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