

Matilda Sanders

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Sent: Friday, April 14, 2006 9:46 AM
To: Filings@psc.state.fl.us
Cc: Culpepper, Robert; Linda Hobbs; Fatool, Vicki; Holland, Robyn P; Nancy Sims; Bixler, Micheale; William Atkinson; Adam Teitzman; Bill Magness; Charles Guyton; Dana Shaffer; Dulaney O'Roark; F. Hoffman; Floyd Self; Garrett Hargrave; Gene Watkins; John Heitmman; Jonathan Marashlian; Ken Hoffman; Marsha Rule; Martin McDonnell; Marva Brown Johnson; Matt Feil; Michael Barrett; Michael Gross; Norman Horton; Raymond Manasco; Scott Porter; Tony Mastando; Vicki Gordon Kaufman
Subject: Docket 041269-TP
Importance: High
Attachments: 041269-TP Joint Motion Ext of Time.pdf

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ECR _____
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OPC _____
RCA _____
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SGA _____
SEC 1 _____
OTH _____

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3. Docket No. 041269-TP
Petition to Establish Generic Docket to Consider Amendments to Interconnection
Agreements Resulting from Changes of Law

2. BellSouth Telecommunications, Inc.
on behalf of Robert Culpepper
1. 6 pages total (includes letter, certificate of service and pleading)
0. Joint Motion for Extension of Time

:<041269-TP Joint Motion Ext of Time.pdf>>

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April 14, 2006

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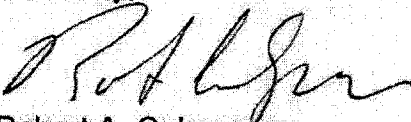
Re: **Docket No. 041269-TP**
**In re: Petition to Establish Generic Docket to Consider Amendments to
Interconnection Agreements Resulting From Changes of Law**

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

DOCUMENT NUMBER-DATE

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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 U. S. Mail this 14th day of April, 2006 to the following:

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Robert A. Culpepper

(+)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: April 14, 2006
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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. 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 21, 2006.¹ 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

¹ On March 31, 2006, the parties requested an extension until April 14, 2006. However, the parties have determined that they need an additional week to finalize and execute the agreements.

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 21, 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 14th day of April, 2006.

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