ANDREW D. SHORE Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0765

April 25, 2006

Mrs. Blanca S. Bayó
Director, 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

In re: Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting From Changes of Law

Dear Ms. Bayo:

Enclosed is BellSouth Telecommunications, Inc.'s ("BellSouth") Response in Opposition to Covad's Expedited 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.

Silicelely

Andrew D. Shore

cc: All Parties of Record James Meza III Jerry D. Hendrix

## 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 25, 2006
	)	

## BELLSOUTH TELECOMMUNICATIONS INC.'S RESPONSE IN OPPOSITION TO COVAD'S EXPEDITED MOTION FOR EXTENSION OF TIME TO FILE AMENDED AGREEMENT

BellSouth Telecommunications, Inc. ("BellSouth") opposes the Motion for Extension of Time to File Amended Agreement ("Motion") filed by Covad on April 20, 2006 and asks the Florida Public Service Commission ("Commission") to reject it.

Covad seeks additional time in which to file an amended interconnection agreement, relying on its pending Motion for Preliminary Injunction filed in federal court. Covad's Motion is unnecessary. The federal district court has been made aware of Covad's concerns with this Commission's orders, and indicated it is "unlikely" that Covad's Motion will be granted during a telephonic hearing that was conducted on April 21, 2006. The federal district court has further indicated that it will issue an order; presumably by or on April 27, 2006. Consequently, there is no reason for Covad to delay execution of an amended interconnection agreement in light of the court's commitment to rule expeditiously on Covad's motion.

Depending on the timing of the court's order, it is conceivable that a very brief extension is warranted. BellSouth does not believe, however, that a ten day extension will be necessary, and BellSouth requests that the Commission deny Covad's Motion in its present form. Instead Covad should be required to execute an amended interconnection agreement by close of

business, April 27, 2006. As soon as is practicable thereafter, that agreement shall be filed with the Commission.

Respectfully submitted, this 25th day of April, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

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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 25th day of April, 2006 to the

## following:

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

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