

ORIGINAL

Timolyn Henry

From: Fatool, Vicki [Vicki.Fatool@BellSouth.COM]
Sent: Thursday, May 25, 2006 4:31 PM
To: Filings@psc.state.fl.us
Subject: 060068-TP BellSouth's Fifth Unopposed Motion for Extension of Time
Importance: High
Attachments: 060068-T.pdf

A. Vickie Fatool
Legal Secretary to Manuel A. Gurdian
BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
(305) 347-5560
Vicki.fatool@bellsouth.com

B. Docket No.: 060068-TP Complaint of National Telecom & Broadband Services, LLC against BellSouth Telecommunications, Inc. for Breach of Interconnection Agreement and Petition for Emergency Order Restoring Service

C. BellSouth Telecommunications, Inc.
on behalf of Manuel A. Gurdian

D. 5 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc.'s Fifth Unopposed Motion for Extension of Time

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<<060068-T.pdf>>

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ORIGINAL

Legal Department

Manuel A. Gurdian
Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

May 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. 060068-TP**
**Complaint of National Telecom & Broadband Services,
LLC against BellSouth Telecommunications, Inc. for
Breach of Interconnection Agreement and Petition for
Emergency Order Restoring Service**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Fifth Unopposed Motion for Extension of Time to File a Responsive Pleading, which we ask that you file in the captioned docket.

A copy has been served upon all parties of record.

Sincerely,



Manuel A. Gurdian

Enclosures

cc: All parties of record
Jerry D. Hendrix
James Meza III
E. Earl Edenfield, Jr.

DOCUMENT NUMBER-DATE

04586 MAY 25 06

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 060068-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via


First Class U.S. Mail and Electronic Mail this 25th day of May, 2006 to the following:

Patrick K. Wiggins
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
pwiggins@psc.state.fl.us

Beth Salak
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
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Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond
White & Krasker, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
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vkaufman@moylelaw.com
Represents National Telecom

National Telecom & Broadband
Services, LLC
Mark Mansour
2626 E. Oakland Boulevard, Suite 400
Ft. Lauderdale, FL 33306
Tel. No. (954) 616-5612
Fax No. (954) 771-7608
mmansour@national-tel.com



Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of National Telecom & Broadband Services, LLC against)	Docket No. 060068-TP
BellSouth Telecommunications, Inc. for)	
Breach of Interconnection Agreement and)	
Petition for Emergency Order Restoring Service)	
<hr style="border: 0.5px solid black;"/>		Filed: May 25, 2006

BELLSOUTH TELECOMMUNICATIONS, INC.'S FIFTH UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

BellSouth Telecommunications, Inc. ("BellSouth") hereby files this Fifth Unopposed Motion for Extension of Time to File Responsive Pleadings to the Complaint of National Telecom & Broadband Services, LLC ("National Telecom") for Breach of Interconnection Agreement and Petition for Emergency Order Restoring Service (hereinafter the "Complaint"), and says:

1. On January 26, 2006, National Telecom filed its Complaint against BellSouth.
2. BellSouth filed an Unopposed Motion for Extension of Time to File an Answer on February 14, 2006.
3. Pursuant to Order No. PSC-06-0162-PCO-TP, BellSouth was granted an extension until March 20, 2006 to file a response to the Complaint.
4. On March 15, 2006, BellSouth filed a Second Unopposed Extension of Time to File Responsive Pleading asking for an extension of time through and including April 19, 2006.
5. On April 19, 2006, BellSouth filed a Third Unopposed Extension of Time to File Responsive Pleading asking for an extension of time through and including May 19, 2006.

6. On May 18, 2006, BellSouth filed a Fourth Unopposed Extension of Time to File Responsive Pleading asking for an extension of time through and including May 25, 2006.

7. BellSouth now seeks an additional seven (7) day extension of time, through and including June 2, 2006, in which to file responsive pleadings to the Complaint.

8. The parties have engaged in extensive negotiations and have been able to reach a settlement. However, additional time is required for the parties to formulate and execute a settlement agreement that will resolve the matter in its entirety.

9. BellSouth makes this timely request in good faith and no party will be prejudiced by the granting of this Motion. National Telecom has no objection to the requested relief.

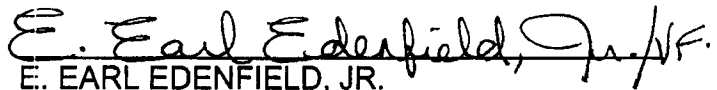
WHEREFORE, BellSouth respectfully requests a seven (7) day extension of time, through and including June 2, 2006, to file responsive pleadings to the Complaint.

Respectfully submitted this 25th day of May, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



JAMES MEZA NI
MANUEL A. GURDIAN
c/o Nancy H. Sims
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