

Matilda Sanders

From: Ann Bassett [abassett@lawfla.com]
Sent: Tuesday, June 06, 2006 3:13 PM
To: Filings@psc.state.fl.us
Subject: Docket No. 050119-TP and 050125-TP
Attachments: 2006-06-06, Motion to Extend page limit on posthearing brief.pdf

The person responsible for this electronic filing is:

Floyd R. Self
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720
fself@lawfla.com

The Docket Nos are

Docket 050119-TP - In re: Joint petition by TDS Telecom d/b/a TDS Telecom/Quincy Telephone; ALLTEL Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecommunications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

Docket No. 050125-TP - In re: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC. Filing on behalf of Sprint Spectrum Limited Partnership, Nextel South Corporation, Sprint Communications Company Limited Partnership, T-Mobile USA, Inc. and MetroPCS Florida, LLC.

Joint Motion to Request Extension of Page Limit for Posthearing Brief

6 pages total.

Ann Bassett
Messer, Caparello & Self, P.A.
Phone: 850-201-5225
abassett@lawfla.com

CMP
COM 5
CTR
ECR
GCL
OPC
RCA
SCR
SGA
SEC i
OTH kimp.

DOCUMENT NUMBER-DATE

04862 JUN -6 8

FPSC-COMMISSION CLERK

6/6/2006

ORIGINAL

LAW OFFICES  
Messer, Caparello & Self  
A Professional Association

Post Office Box 1876  
Tallahassee, Florida 32302-1876  
Internet: www.lawfla.com

June 6, 2006

**ELECTRONIC FILING**

Ms. Blanca Bayó, Director  
Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket Nos. 050119-TP and 050125-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint Spectrum Limited Partnership, Nextel South Corporation, Sprint Communications Company Limited Partnership, T-Mobile USA, Inc., and MetroPCS Florida, LLC is an electronic version of a Joint Motion to Request Extension of Page Limit for Posthearing Brief in the above referenced dockets.

Thank you for your assistance with this filing.

Sincerely yours,

  
Floyd R. Self

FRS/amb  
Enclosure

DOCUMENT NUMBER - DATE

04862 JUN -6 06

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition by TDS Telecom d/b/a TDS Telecom/Quincy Telephone; ALLTEL Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecommunications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

DOCKET NO. 050119-TP

In re: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC.

DOCKET NO. 050125-TP  
Filed: June 6, 2006

**JOINT MOTION TO REQUEST EXTENSION OF PAGE LIMIT FOR  
POSTHEARING BRIEF**

Sprint Spectrum Limited Partnership, Nextel South Corporation, Sprint Communications Company Limited Partnership (Collectively, "Sprint Nextel"), T-Mobile USA, Inc. ("T-Mobile"), and MetroPCS Florida, LLC ("MetroPCS") (hereinafter, "Joint CMRS Carriers"), pursuant to Rule 28-106.204(1), Florida Administrative Code, request the Commission to extend the page limit to 55 pages for the Joint CMRS Carriers' Posthearing Brief, due Friday, June 9, 2006, and as grounds therefore, state:

1. On December 6, 2005, the Commission issued Order No. Order No. PSC-05-1206-PCO-TP establishing the page limit for the posthearing brief at 40 pages.
2. The Joint CMRS Carriers are preparing for filing a Joint Posthearing Brief reflecting a single consolidated brief on all of the issues for these three parties. While each of the Joint CMRS Carriers could file a separate brief, totaling 120 pages in the aggregate, the Joint CMRS Carriers believe that a single brief on their behalf with a joint but single position on each issue will better

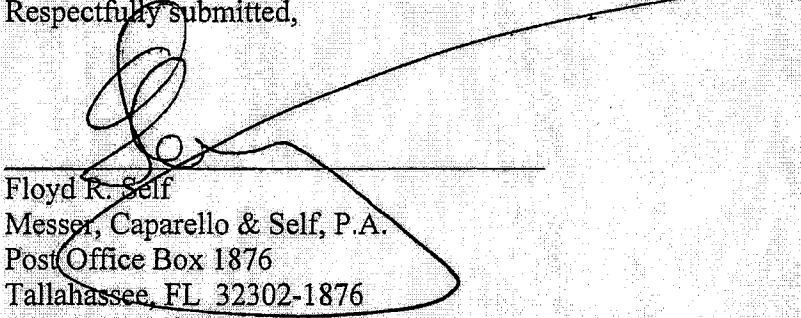
serve their interests and afford the Commission with a better understanding of their position, while serving fewer total pages.

3. This page extension Motion, if granted, would only apply to the Joint CMRS Carriers.

4. Undersigned counsel has advised the other parties of this request. While we have not received a response from every party, as of the time of filing of those who did respond, no party objected to the granting of this request.

WHEREFORE, Sprint Nextel, T-Mobile, and MetroPCS respectfully request that the Commission extend the page limit of the Posthearing Briefs from 40 pages to 55 pages.

Respectfully submitted,



Floyd R. Self  
Messer, Caparello & Self, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
(850) 222-0720 (p)  
(850) 224-4359 (f)

Michele K. Thomas, Esq.  
Corporate Counsel  
T-Mobile  
60 Wells Avenue  
Newton, MA 02459  
(617) 630-3126 (p)  
(617) 630-3187 (f)

Counsel to T-Mobile USA, Inc.

Vicki Gordon Kaufman  
Moyle Flanigan Katz White & Krasker, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
(850) 681-3828 (p)  
(850) 681-8788 (f)

Charles V. Gerkin, Jr.  
Friend, Hudak & Harris, LLP  
Three Ravinia Drive, Suite 1450  
Atlanta, Georgia 30346  
770-399-9500 (p)  
770-234-5965 (f)

Counsel to MetroPCS Florida, LLC

Vicki Gordon Kaufman  
Moyle Flanigan Katz White & Krasker, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
(850) 681-3828 (p)  
(850) 681-8788 (f)

William R. Atkinson, Esq.  
Sprint Nextel (GA)  
Mail Stop GAATLD0602  
3065 Cumberland Circle, SE  
Atlanta, GA 30339  
(404) 649-4882 (p)  
(404) 649-1652 (f)

Counsel to Sprint Spectrum Limited Partnership,  
Nextel South Corporation, Sprint  
Communications Company Limited Partnership

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by electronic mail and U. S. Mail this 6<sup>th</sup> day of June, 2006.

Felicia Banks, Esq.  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[fbanks@psc.state.fl.us](mailto:fbanks@psc.state.fl.us)

Kira Scott, Esq.  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[kscott@psc.state.fl.us](mailto:kscott@psc.state.fl.us)

Mr. Michael Barrett  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[mbarrett@psc.state.fl.us](mailto:mbarrett@psc.state.fl.us)

Stephen B. Rowell  
Bettye Willis  
ALLTEL  
One Allied Drive, B5F11  
Little Rock, AR 72202

Mr. James White  
ALLTEL  
6867 Southpoint Drive., N., Suite 103  
Jacksonville, FL 32216-8005  
[james.white@alltel.com](mailto:james.white@alltel.com)

Tracy W. Hatch  
Senior Attorney  
AT&T  
101 N. Monroe Street, Suite 700  
Tallahassee, FL 32301  
[thatch@att.com](mailto:thatch@att.com)

J. Jeffrey Wahlen  
Ausley Law Firm  
P.O. Box 391  
Tallahassee, FL 32302  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

Nancy B. White  
R. Douglas Lackey  
Meredith Mays  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301  
[nancysims@bellsouth.com](mailto:nancysims@bellsouth.com)

Benjamin H. Dickens, Esq.  
Blooston Law Firm  
2120 L Street, NW, Suite 300  
Washington, DC 20037  
[bhd@bloostonlaw.com](mailto:bhd@bloostonlaw.com)

Ms. Angie McCall  
Frontier Communications of the South, Inc.  
300 Bland Street  
Bluefield, WV 24701-3020  
[AmcCall@czn.com](mailto:AmcCall@czn.com)

Mr. Mark Beightol  
GT Com  
P.O. Box 220  
Port St. Joe, FL 32457-0220  
[mbeightol@fairpoint.com](mailto:mbeightol@fairpoint.com)

Mr. Robert M. Post, Jr.  
ITS Telecommunications Systems, Inc.  
P.O. Box 277  
Indiantown, FL 34956-0277  
[maryannh@itstelecom.net](mailto:maryannh@itstelecom.net)

Ms. Deborah Nobles  
NEFCOM  
505 Plaza Circle, Suite 200  
Orange Park, FL 32073-9409  
[dnobles@townes.net](mailto:dnobles@townes.net)

Kenneth A. Hoffman, Esq.  
Rutledge Law Firm  
P.O. Box 551  
Tallahassee, FL 32302-0551  
[ken@reuphlaw.com](mailto:ken@reuphlaw.com)

Smart City Telecom  
P.O. Box 22555  
Lake Buena Vista, FL 32830-2555  
[ibhall@smartcity.com](mailto:ibhall@smartcity.com)

Mr. Thomas M. McCabe  
TDS Telecom/Quincy Telephone  
P.O. Box 189  
Quincy, FL 32353-0189  
[Thomas.mccabe@tdstelecom.com](mailto:Thomas.mccabe@tdstelecom.com)

Vicki Gordon Kaufman  
Moyle Flanigan Katz Raymond & Sheehan, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
[vkaufman@moylelaw.com](mailto:vkaufman@moylelaw.com)

Charles V. Gerkin, Jr.  
Friend Law Firm  
Three Ravinia Drive, Suite 1450  
Atlanta, GA 30346  
[cgerkin@fh2.com](mailto:cgerkin@fh2.com)

MetroPCS Florida, LLC  
8144 Walnut Hill Lane, Suite 800  
Dallas, TX 75231

Mr. Ronald W. Gavillet  
Neutral Tandem-Florida, LLC  
One South Wacker, Suite 200  
Chicago, IL 60606  
[rgavillet@neutraltandem.com](mailto:rgavillet@neutraltandem.com)

Ms. Susan J. Berlin  
NuVox Communications, Inc.  
Two North main Street  
Greenville, SC 29601  
[sberlin@nuvox.com](mailto:sberlin@nuvox.com)

Susan Masterton  
Sprint Communications Company Limited Partnership  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

William R. Atkinson, Esq.  
Sprint Nextel (GA)  
Mail Stop GAATLD0602  
3065 Cumberland Circle, SE  
Atlanta, GA 30339  
[bill.atkinson@sprint.com](mailto:bill.atkinson@sprint.com)

Charles F. Palmer  
Troutman Sanders LLP  
600 Peachtree Street, N.E., Suite 5200  
Atlanta, GA 30328-2216  
[charles.palmer@troutmansanders.com](mailto:charles.palmer@troutmansanders.com)

Elaine D. Critides  
Verizon Wireless  
Legal & External Affairs Department  
1300 I Street, N.W., Suite 400 West  
Washington, DC 20005  
[elaine.critides@verizonwireless.com](mailto:elaine.critides@verizonwireless.com)

Michele K. Thomas, Esq.  
Sr. Corporate Counsel  
T-Mobile  
60 Wells Avenue  
Newton, MA 02459  
[Michele.Thomas@T-Mobile.com](mailto:Michele.Thomas@T-Mobile.com)

Michael A. Gross, Esq.  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue  
Tallahassee, FL 32303  
[mgross@fcta.com](mailto:mgross@fcta.com)

Joseph M. Chiarelli  
Sprint Nextel  
6450 Sprint Parkway  
Mailstop KSOPHN0212-2A411  
Overland Park, KS 66251

Holly Henderson  
Southern Communications Services, Inc.  
d/b/a SouthernLINCWireless  
5555 Glenridge Connector, Suite 500  
Atlanta, Georgia 30342

Todd D. Daubert  
Kelley Drye & Warren LLP  
1200 19th Street, N.W., Suite 500  
Washington, DC 20036

Leigh A. Hyer  
Verizon Access Transmission Services  
P.O. Box 110, FLTC0717  
Tampa, FL 33601-0110

  
Floyd R. Self