

Matilda Sanders

From: terry.scobie@verizon.com
Sent: Monday, October 30, 2006 9:21 AM
To: Filings@psc.state.fl.us
Cc: de.oroark@verizon.com; David Christian; frank.app@verizon.com
Subject: Docket No. 020960-TP - Verizon Florida/Covad Joint Motion for Extension of Time

Attachments: 020960 VZ FL-Covad-Joint Motion for Extension 10-30-06.pdf



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The attached filing is submitted in Docket No. 020960-TP on behalf of Verizon Florida Inc. and Covad Communications Company by

Dulaney L. O'Roark III
Six Concourse Parkway
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The attached .pdf document contains 4 pages - transmittal letter (1 page), certificate of service (1 page), and Joint Motion for Extension of Time (2 pages).

(See attached file: 020960 VZ FL-Covad-Joint Motion for Extension 10-30-06.pdf)

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October 30, 2006 – VIA ELECTRONIC MAIL

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 020960-TP
Petition for Arbitration of open issues resulting from interconnection negotiations
with Verizon Florida Inc. by DIECA Communications, Inc. d/b/a Covad
Communications Company

Dear Ms. Bayo:

Enclosed for filing in the above matter is a Joint Motion for Extension of Time on behalf
of Verizon Florida Inc. and DIECA Communications, Inc. d/b/a Covad Communications
Company. Service has been made as indicated on the Certificate of Service. If there
are any questions regarding this filing, please contact me at 770-284-5498.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Joint Motion for Extension of Time in Docket No. 020960-TP were sent via U.S. mail on October 30, 2006 to

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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118 North Gadsden Street
Tallahassee, FL 32301

s/Dulaney L. O'Roark III

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of open issues)	Docket No. 020960-TP
resulting from interconnection negotiations)	Filed: October 30, 2006
with Verizon Florida Inc. by DIECA)	
Communications, Inc. d/b/a Covad)	
Communications Company)	
_____)	

JOINT MOTION FOR EXTENSION OF TIME

Verizon Florida Inc. (Verizon) and DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) hereby jointly move that the Commission extend the time to file an interconnection agreement in this arbitration proceeding until March 2, 2007.

Finalizing contract language has been a more comprehensive effort than expected because the parties have had to review previously agreed-upon language, incorporate language stemming from the Final Order on Arbitration, Order No. PSC-03-1139-FOF-TP issued on October 13, 2003, and incorporate TRO/TRRO related changes along with rulings on disputed TRO/TRRO amendment language issued in the Order on Arbitration in Docket No. 040156-TP, Order No. PSC-06-0212-FOF-TP, released March 15, 2006. The parties have made significant progress in agreeing upon a new interconnection agreement and have expended a great deal of time and effort in the following areas:

- Existing contract - A thorough review of previously agreed-upon contract language has been undertaken to ensure it conforms to current business practices. That review has generated numerous agreed-upon changes.
- Order on Arbitration – The parties have been reviewing and incorporating language that conforms to interconnection arbitration Order No. PSC-03-1139-FOF-TP issued on October 13, 2003.
- TRO/TRRO amendment language – The parties are incorporating TRO/TRRO related changes along with language to incorporate disputed language issues resolved in the Order on Arbitration in Docket No. 040156-TP, Order No. PSC-06-0212-FOF-TP.

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Given the complexity of this effort and the willingness of both parties to continue to work toward an agreed-upon conforming agreement, Verizon and Covad respectfully request that the Commission extend the time for filing their agreement until March 2, 2007. Because both parties join in this request, no party will be prejudiced by this extension.

WHEREFORE, for the foregoing reasons, Verizon and Covad respectfully request that the Commission extend the time for filing an executed, conforming amendment to March 2, 2007.

Respectfully submitted on October 30, 2006.

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Attorney for Verizon Florida Inc.

s/ Charles E. Watkins
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Communications Company