

**Matilda Sanders**

**ORIGINAL**

**From:** Woods, Vickie [Vickie.Woods2@bellsouth.com]  
**Sent:** Tuesday, November 28, 2006 4:14 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** 060677-TL BellSouth Telecommunications, Inc.'s Third Motion for Extension of Time  
**Importance:** High  
**Attachments:** 060677-T.pdf

- A. Vickie Woods  
 Legal Secretary to James Meza III and Manuel Gurdian  
 BellSouth Telecommunications, Inc.  
 150 South Monroe Street  
 Suite 400  
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 (305) 347-5560  
[vickie.woods2@bellsouth.com](mailto:vickie.woods2@bellsouth.com)
- B. Docket No. 060677-TL: Petition to Implement Automatic Enrollment for Lifeline Telephone Service
- C. BellSouth Telecommunications, Inc.  
 on behalf of Manuel A. Gurdian
- D. 5 pages total (including letter, certificate of service and pleading)
- E. BellSouth Telecommunications, Inc.'s Third Motion for Extension of Time  
  
 .pdf version attached

<<060677-T.pdf>>

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Manuel A. Gurdian  
Attorney

BellSouth Telecommunications, Inc.  
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(305) 347-5561

November 28, 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.: 060677-TL  
Petition to Implement Automatic Enrollment for Lifeline  
Telephone Service**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Third Motion for Extension of Time, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
Manuel A. Gurdian

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

DOCUMENT NUMBER-DATE

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**CERTIFICATE OF SERVICE**  
**Docket No. 060677-TL**

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

(\*) Electronic Mail and First Class U. S. Mail this 28th day of November, 2006 to the following:

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Manuel A. Gurdian

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition to Implement Automatic )  
Enrollment for Lifeline Telephone Service)

Docket No.: 060677-TL  
Filed: November 28, 2006

**BELLSOUTH'S THIRD MOTION FOR EXTENSION OF TIME**

BellSouth Telecommunications, Inc. ("BellSouth") asks the Florida Public Service Commission ("Commission") for a third extension of time in which to file its response to the Petition to Implement Automatic Enrollment for Lifeline Telephone Service ("Petition") filed by the Citizens of Florida, through Harold McLean, Public Counsel, and AARP (jointly referred to as "Joint Petitioners"). In support of this Motion, BellSouth states the following:

1. On or about October 11, 2006, the Joint Petitioners filed their Petition requesting that the Commission order local exchange telecommunications companies in Florida to implement practices and procedures with the Department of Children and Families to automatically enroll eligible customers in the Lifeline telephone program.
2. In accordance with Commission Rules, BellSouth's response to the Petition was originally due on October 31, 2006.
3. On November 7, 2006, pursuant to Order No.: PSC-06-0935-PCO-TL, BellSouth was granted an extension of time until November 17, 2006 to file a response to the Petition.
4. On or about November 17, 2006, BellSouth requested a second extension of time until November 28, 2006.

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5. On November 27, 2006, pursuant to Order No. PSC-06-0977-PCO-TL, BellSouth was granted an extension of time until November 28, 2006 to file a response to the Petition.

6. On or about November 17, 2006, the Florida Telecommunications Industry Association, Inc. ("FTIA") filed a Motion to Intervene and for Abeyance. FTIA's Motion asks that the Commission hold the instant docket in abeyance for six months, pending the results of the Commission's newly initiated On-Line Automated Lifeline and Link-Up Application Process and the upcoming industry workshops scheduled for February 2007.

7. BellSouth supports FTIA's request for a six-month abeyance of the instant docket because BellSouth believes that, before expending the resources and time litigating the Petition, the Commission should review the results of the newly initiated On-Line Automated Lifeline and Link-Up Application Process and allow interested parties to better understand the new process by participating in the upcoming industry workshops scheduled for February 2007.

8. On or about November 28, 2006, BellSouth filed its own Motion for Abeyance which requests the same relief as FTIA's Motion for Abeyance.

9. BellSouth is requesting an extension to respond to the Petition until either of the following scenarios occurs: (a) the Commission grants its Motion for Abeyance or (b) the Commission denies its Motion for Abeyance. Should the Commission grant its Motion, BellSouth requests an extension to respond until ten days after the abeyance period has ended. In the event the Commission

denies its Motion, BellSouth requests an extension to respond until ten days after the Commission's Order denying its Motion is entered.

10. No party would be negatively impacted by the Commission granting BellSouth's third requested extension. Further, there is no procedural schedule in place to be impacted.

11. BellSouth contacted the parties in this docket as to whether the parties objected to the above Motion; however, prior to the filing of this Motion BellSouth did not receive a response from all the parties. Of the responses it did receive, Windstream did not object to the Motion; however, AARP and the Attorney General's office objected to the Motion.

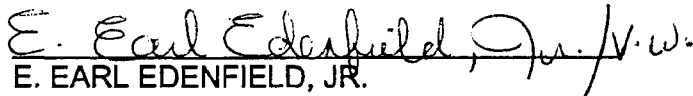
WHEREFORE, for the foregoing reasons, BellSouth respectfully requests an extension of time in which to file its response to the Petition.

Respectfully submitted, this 28th day of November, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



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