

Timolyn Henry

From: terry.scobie@verizon.com
Sent: Tuesday, February 20, 2007 10:02 AM
To: Filings@psc.state.fl.us
Cc: de.oroark@verizon.com; David Christian; frank.app@verizon.com;
demetria.c.watts@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 2-20-07.pdf



020960 VZ
.-Covad Joint Motio.

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

Dulaney L. O'Roark III
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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 2-20-07.pdf)

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ORIGINAL



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February 20, 2007 – 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 LLC 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

DOCUMENT NUMBER-DATE

01638 FEB 20 08

FPSC-COMMISSION CLERK

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 February 20, 2007 to

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

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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: February 20, 2007
with Verizon Florida Inc. by DIECA)
Communications, Inc. d/b/a Covad)
Communications Company)
-----)

JOINT MOTION FOR EXTENSION OF TIME

Verizon Florida LLC (“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 proceeding until August 31, 2007.

As stated in the parties’ previous motion for extension of time that was granted in Order No. PSC-06-1009-PCO-TP, 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 on March 15, 2006.

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 August 31, 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 August 31, 2007.

Respectfully submitted on February 20, 2007.

s/ Dulaney L. O’Roark III

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s/ Charles E. Watkins

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