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Griffin, Kecia (CAO) [KGRIFFIN@miamidade.gov]

Sent:

Thursday, March 15, 2007 2:28 PM

To:

Filings@psc.state.fl.us

Cc:

Re:

Hope, David (Airport); Lee, Cynji (Airport); Martin B. Goldberg; Lawrence Lambert;

Jean.Kiddoo@bingham.com; Danielle C. Burt; Douglas E. Starcher

Subject:

BellSouth - Joint Motion for Extension of Filing Dates

Attachments: BellSouth - Joint Motion for Extension of Filing Dates.PDF

March 15, 2007

Mrs. Blanca S. Bayó Director, Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard

Complaint by BellSouth Telecommunication, Inc., Regarding the Operation of a Telecommunication Company by Miami-Dade County in Violation of Florida Statutes and Commission Rules

(Docket No. 050257)

Dear Mrs. Bayó:

Enclosed is an original Joint Motion for Extension for Filing Dates for all parties BellSouth Telecommunications, Inc., Miami-Dade County and The Greater Orlando Aviation Authority.

Copies have been served to the parties shown on the attached Certificate of Service.

cc: All Parties of Record David Stephen Hope Cynji Lee

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth

Telecommunications, Inc. Regarding
The Operation of a Telecommunications)
Company by Miami-Dade County in
Violation of Florida Statutes and
Commission Rules

Docket No.: 050257-TL

JOINT MOTION FOR EXTENSION OF FILING DATES

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), Miami-Dade County (the "County"), and the Greater Orlando Aviation Authority ("GOAA") (collectively, the "Parties"), by and through their undersigned counsel hereby file this Joint Motion for Extension of Filing Dates in the above styled matter, Docket No. 050257-TL, and in support of their Motion state:

- 1. Pursuant to the Order Granting Proposed Joint Procedural Schedule, Order No. PSC-06-0326-PCO-TL, issued April 21, 2006, direct briefs are currently to be filed by the Parties on or before March 26, 2007, and reply briefs on or before April 10, 2007. The Parties hereby request a brief extension of thirty (30) days, which would make direct briefs due on April 25, 2007, and reply briefs due on May 10, 2007.
- 2. Said extension will allow AT&T Florida and the County an opportunity to discuss settlement alternatives. In addition, the extension will permit the Parties additional time to compile a complete set of the voluminous exhibits for use by the Parties in preparing their briefs and by the Commission in its review.

02375 MAR 15 5

WHEREFORE, BellSouth Telecommunications, Inc. d/b/a AT&T Florida, Miami-Dade County, and the Greater Orlando Aviation Authority respectfully request this Commission grant the Parties a thirty (30) day extension of the filing dates in this matter so that initial briefs are due on April 25, 2007 and reply briefs are due on May 10, 2007.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T Florida

tor

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