Matilda Sanders

From:	Griffin, Kecia (CAO) [KGRIFFIN@miamidade.gov]	ORICINIA	
Sent:	Thursday, April 12, 2007 11:39 AM	ORIGINAL	
То:	Filings@psc.state.fl.us		
•	Line Dovid (Airport): Line Dovid (CAO): Martin P. Coldha	ray Joon Kiddoo@hinghom.com; Doniollo.C. J	

- Cc: Hope, David (Airport); Hope, David (CAO); Martin B. Goldberg; Jean.Kiddoo@bingham.com; Danielle C. Burt; Douglas E. Starcher; Lawrence Lambert; Lee, Cynji (Airport)
- Subject: Joint Motion For Second Extension of filing Dates

Attachments: BellSouth v MDC Joint Motion for Second Ext of Filing Dates.pdf

April 12, 2007

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

Re: 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-TL)

Dear Mrs. Bayó:

Enclosed is an original Joint Motion for Second 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	CMP
	David Stephen Hope	COM
	Cynji Lee	CTR
		ECR
		GCL
		OPC
		RCA
		SCR
		SGA
		SEC
		отн <u>КР</u>

DOCUMENT NUMBER-DATE

03112 APR 12 5

FPSC-COMMISSION CLERK

ORIGINAL

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 SECOND 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 Second 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, and the Parties Joint Motion for Extension of Filing Dates filed March 15, 2007, direct briefs are currently to be filed by the Parties on or before April 25, 2007, and reply briefs on or before May 10, 2007. The Parties hereby request a brief extension of thirty (30) days, which would make direct briefs due on May 25, 2007, and reply briefs due on June 11, 2007.

2. Said extension will allow AT&T Florida and the County to continue 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.

DOCUMENT NUMBER-DATE 03112 APR 125 FPSC-COMMISSION CLERK In re: Complaint by BellSouth Telecommunications, Inc. Docket No. 050257-TL

GREATER ORLANDO AVIATION AUTHORITY

Jean L. Kiddoo, Esq.

Danielle C. Burt, Esq. Bingham McCutchen LLP 2020 K. Street, N.W. Washington, DC, 20006-1806 Tel. No. (202) 373-6034 Fax No. (202) 424-7645 Jean.Kiddoo@bingham.com Danielle.Burt@bingham.com

Douglas Starcher, Esq. Broad and Cassel 390 North Orange Avenue Suite 1100 Orlando, FL 32801-4961 Tel. No. (407) 839-4208 Fax No. (407) 650-0943 dstarcher@broadandcassel.com In re: Complaint by BellSouth Telecommunications, Inc. Docket No. 050257-TL

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 second thirty (30) day extension of the filing dates in this matter so that initial briefs are due on May 25, 2007 and reply briefs are due on June 11, 2007.

DATED: April 12, 2007

Respectfully submitted,

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

Martin B. Goldberg, Esq.

LASH & GOLDBERG LLP Bank of America Tower, Suite 1200 100 Southeast Second Street Miami, Florida 33131 Tel. No. (305) 347-4040 Fax No. (305) 347-4050 mgoldberg@lashgoldberg.com

MIAMI-DADE COUNTY

MURRAY A. GREENBERG

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