

**Ruth Nettles**

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**From:** terry.scobie@verizon.com  
**Sent:** Tuesday, August 28, 2007 9:41 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** de.oroark@verizon.com; david.christian@core.verizon.com; 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 8-28-07.pdf

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), Joint Motion for Extension of Time (2 pages) and certificate of service (1 page).

*(See attached file: 020960 VZ FL-Covad Joint Motion for Extension 8-28-07.pdf)*

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8/28/2007

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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August 28, 2007 – **VIA ELECTRONIC MAIL**

Ann Cole, Commission Clerk  
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. Cole:

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 678-259-1449.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

|  |                        |
|--|------------------------|
| In re: Petition for Arbitration of open issues ) | Docket No. 020960-TP   |
| resulting from interconnection negotiations )    | Filed: August 28, 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 arbitration proceeding until October 31, 2007.

As stated in the parties' previous motion for extension of time, 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 PSC-06-0212-FOF-TP, released on March 15, 2006.

Verizon and Covad have made tremendous progress towards completing the interconnection agreement and have resolved all issues but one. Additional time is required for each side to resolve this single remaining issue and to complete administrative details associated with executing and delivering the interconnection agreement for Commission approval.

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 October 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 October 31, 2007.

Respectfully submitted on August 28, 2007.

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Attorneys for DIECA Communications, Inc. d/b/a  
Covad Communications Company

## 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 August 28, 2007 to

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\_\_\_\_\_/s/Dulaney L. O'Roark III\_\_\_\_\_