

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
RICHARD M. ELLIS
KENNETH A. HOFFMAN
JOHN M. LOCKWOOD
MARTIN P. McDONNELL
J. STEPHEN MENTON

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

R. DAVID PRESCOTT
HAROLD F. X. PURNELL
MARSHA E. RULE
GARY R. RUTLEDGE
MAGGIE M. SCHULTZ
GOVERNMENTAL CONSULTANTS
JONATHAN M. COSTELLO
MARGARET A. BENDUNI

January 17, 2008

RECEIVED-FPSC
JAN 17 PM 4:00
COMMISSION
CLERK

Via Hand Delivery

Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 000475-TP
Complaint by Bellsouth Telecommunications, Inc., against Thrifty Call, Inc.
regarding practices in the reporting of percent interstate usage for compensation
for jurisdictional access services

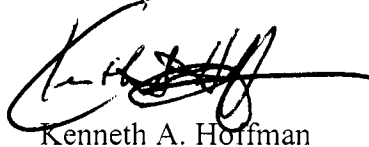
Dear Ms. Cole:

Enclosed for filing on behalf of Thrifty Call, Inc. ("Thrifty Call"), please find an original and fifteen copies of Thrifty Call's Unopposed Motion for Extension of Time to File Direct and Rebuttal Testimony and Exhibits.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for assistance with this filing.

Sincerely,



Kenneth A. Hoffman

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL 2 _____
- OPC KAH/rl _____
- RCA 1 _____
- SCR _____
- SGA _____
- SEC _____
- OTH _____

Enclosures
F:\USERS\Marty\Thrifty Call\011708coleltr.wpd

DOCUMENT NUMBER-DATE

00469 JAN 17 08

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:)
) Docket No. 000475-TP
Complaint by BellSouth Telecommunications, Inc.)
against Thrifty Call, Inc. regarding practices in the) Filed: January 17, 2008
reporting of percent interstate usage for compensa-)
tion for jurisdictional access services)

**THRIFTY CALL, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE DIRECT AND REBUTTAL TESTIMONY AND EXHIBITS**

Thrifty Call, Inc. ("Thrifty Call"), by and through undersigned counsel, and pursuant to Rule 28-106.204, Florida Administrative Code, respectfully requests the Prehearing Officer to grant a two (2) week extension for the parties and Commission staff to file prefiled direct testimony and exhibits, and a one (1) week extension for parties and staff to file prefiled rebuttal testimony and exhibits, and as grounds therefore, states as follows:

1. On December 28, 2007, the Prehearing Officer issued Order No. PSC -07-1027-PCO-TP in the instant docket modifying the procedural schedule (the "Order"). Pursuant to the Order, the parties are required to file prefiled direct testimony and exhibits on or before January 24, 2008, and to file prefiled rebuttal testimony and exhibits by February 24, 2008. The Order additionally adopted a tentative issues list which includes: the terms and conditions of the tariff associated with AT&T's backbilling of purportedly misreported Percent Interstate Usage ("PIU"); AT&T's compliance with its tariff provisions; Thrifty Call's good faith reporting of its PIU; and potential damages.

2. This docket was opened in April, 2000. On November 21, 2001, the Commission issued Order No. PSC -01-2309-PCO-TP, granting Thrifty Call's motion to stay the proceeding. No substantive issues had been resolved prior to the issuance of Order No. PSC-01-2309-PCO-TP. Subsequent to approximately April 1, 2001, Thrifty Call has ceased to exist as a corporate

DOCUMENT NUMBER-DATE

00469 JAN 17 08

FPSC-COMMISSION CLERK

entity. Thrifty Call currently has no board of directors, attorneys, accountants, or any management team.

3. On July 20, 2005, AT&T filed a motion to lift the stay and establish a procedural schedule. On November 2, 2005, the Commission issued Order No. PSC-05-1100-PCO-TP, granting AT&T's motion to lift stay and establish procedural schedule.

4. By way of historical background, on January 25, 2002, Thrifty Call transmitted call detail records to the Commission staff pursuant to staff's request to conduct an audit thereon. Additionally, on February 2, 2002, March 21, 2002, and August 30, 2002, Thrifty Call provided additional information to the Commission staff pursuant to the staff's requests. On August 5, 2004, approximately two years later, staff conducted its audit exit conference and sent its audit report to the Division of the Commission Clerk and Administrative Services. As stated above, during this time, Thrifty Call was no longer in existence as a legal corporate entity. Staff's audit was reported to have taken in excess of 100 hours. However, staff also stated in the audit report that "this report should not be relied upon for any purpose except to assist the Commission staff in the performance of their duties. Substantial additional work would have to be performed to satisfy generally accepted auditing standards and produce audited financial statements for public use." (Division of Regulatory Compliance and Consumer Assistance Auditor's Report dated June 24, 2004, at page 1, in Docket No. 000475.)


5. As Thrifty Call currently has no auditing staff or other managerial staff, undersigned counsel has been seeking the assistance of outside consulting firms to assist in analyzing staff's audit, and preparing prefiled direct and rebuttal testimony and exhibits addressing the audit report. Undersigned counsel has only recently been able to secure a consulting group to assist in this undertaking. Undersigned counsel has been advised by the

consulting group that it would not be possible to complete its review of staff's audit report and prepare and file prefiled direct testimony (and exhibits, if necessary) by January 24, 2008. Thrifty Call's consultant requires an additional two weeks to review and analyze all pertinent information and prepare prefiled direct testimony (and exhibits, if necessary).

6. Undersigned counsel has conferred with AT&T/BellSouth's counsel regarding this motion and is authorized to represent that AT&T/BellSouth has no objection to the granting of Thrifty Call's request.

WHEREFORE, Thrifty Call, Inc. respectfully requests that the Prehearing Officer grant this Motion and enter an Order allowing the parties and staff a two-week extension up to and until February 7, 2008 to file prefiled direct testimony and exhibits and a one week extension until March 3, 2008 to file prefiled rebuttal testimony and exhibits.

RESPECTFULLY SUBMITTED this 17th day of January, 2008.



KENNETH A. HOFFMAN, ESQUIRE
FLA BAR No.: 307718
MARTIN P. MCDONNELL, ESQUIRE
FLA BAR No.: 031728
Rutledge, Ecenia, Purnell & Hoffman, P.A.
215 South Monroe Street, Ste. 420
P.O. Box 551
Tallahassee, FL 32302
850-681-6788 (telephone)
850-681-6515 (telecopier)

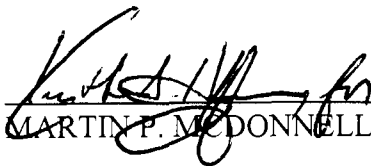
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail to the following this 17th day of January, 2008:

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

James Meza, III
Tracy W. Hatch
Manuel A. Gurdian
c/o Nancy Sims
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301

E. Earl Edenfield, Jr.
John T. Tyler
Suite 4300, AT&T Midtown Center
675 W. Peachtree Street, NE
Atlanta, GA 30375


MARTIN P. McDONNELL, ESQ.

F:\USERS\Marty\thrifty call\011708extension.motion.doc