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March 6, 2008

Via Hand Delivery

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

RECEIVED-FPSC
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COMMISSION
CLERK

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, Inc.'s Unopposed Motion for an Extension of Time to Respond to AT&T Florida's Third Set of Interrogatories and Third Request for Production of Documents.

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,

Martin P. McDonnell

Martin P. McDonnell

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL 2 _____
- OPC _____
- RCA 1 _____
- SCR _____ MPM/vp
- SGA _____ Enclosures
- SEC _____
- OTH _____

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:)
)
Complaint by BellSouth Telecommunications, Inc.) Docket No. 000475-TP
against Thrifty Call, Inc. regarding practices in the) Filed: March 6, 2008
reporting of percent interstate usage for compensa-)
tion for jurisdictional access services)
_____)

THRIFTY CALL, INC.'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND TO AT&T FLORIDA'S THIRD SET OF INTERROGATORIES AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS

Thrifty Call, Inc. ("Thrifty Call"), pursuant to Order No. PSC-07-1027-PCO-TP (the "Order Modifying Procedure"), issued December 28, 2007, hereby respectfully requests a brief extension of time to file its responses to AT&T's Third Set of Interrogatories (Nos. 51-71) and Third Request for Production of Documents (Nos. 23 & 24) to Thrifty Call in the captioned docket.

1. On February 20, 2008, AT&T Florida ("AT&T") served upon Thrifty Call its Third Set of Interrogatories (Nos. 51-71) and Third Request for Production of Documents (Nos. 23 & 24) to Thrifty Call in the above captioned docket. Thrifty Call has been diligently preparing its responses to the AT&T discovery requests. Unfortunately, because of the unavailability of Thrifty Call witness Timothy J. Gates (to whom most of the discovery is directed) Thrifty Call will be unable to have the responses filed by the date required in the Order Modifying Procedure; March 10, 2008.

2. However, Thrifty Call can have the responses filed with the Commission and served on the parties on March 14, 2008.

3. Undersigned counsel has discussed this request with Manuel A. Gurdian, counsel for AT&T, who advised that he has no objection to the granting of this brief extension of time to

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file the responses. Mr. Gurdian asks that Thrifty Call serve its responses to AT&T on March 14, 2008 via email and regular mail. Thrifty Call agrees to do so.

Wherefore, Thrifty Call respectfully requests that the Commission grant until March 14, 2008 to file and serve its responses to AT&T's Third Set of Interrogatories (Nos. 51-71) and Third Request for Production of Documents (Nos. 23 &24).

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail to the following this 6 day of March, 2008:

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MARTIN P. MCDONNELL, ESQ.

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