

Ruth Nettles

From: Woods, Vickie [vf1979@att.com]
Sent: Wednesday, April 29, 2009 4:32 PM
To: Filings@psc.state.fl.us
Subject: 090142-TP AT&T's Unopposed Motion for Extension of Time
Attachments: Document.pdf

A. Vickie Woods
Legal Secretary to E. Earl Edenfield, Jr., Tracy W. Hatch,
and Manuel A. Gurdian,
BellSouth Telecommunications, Inc. d/b/a AT&T Florida
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B. Docket No. 090142-TP:

Complaint of Cbeyond Communications, LLC Against AT&T Communications of the Southern States, LLC d/b/a AT&T and AT&T Florida for failure to pay intrastate access charges pursuant to Cbeyond's Price List and interconnection Agreement and for violation of Section 364.16(3)(a), Florida Statutes

C. BellSouth Telecommunications, Inc.
on behalf of Manuel A. Gurdian

D. 4 pages total in PDF format (includes letter, certificate and pleading)

E. .pdf

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4/29/2009

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April 29, 2009

Ms. Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **Docket No. 090142-TP:**
**Complaint of Cbeyond Communications, LLC Against AT&T
Communications of the Southern States, LLC d/b/a AT&T and
AT&T Florida for failure to pay intrastate access charges
pursuant to Cbeyond's Price List and interconnection Agreement
and for violation of Section 364.16(3)(a), Florida Statutes**

Dear Ms. Cole:

Enclosed is AT&T Communications of the Southern States, LLC and
BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Unopposed Motion for
Extension of Time to Respond to Amended Complaint, which we ask that you file in
the captioned docket.

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

Sincerely,

Manuel A. Gurdian

cc: All parties of record
Jerry Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.

CERTIFICATE OF SERVICE
Docket No. 090142-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and First Class U.S. Mail this 29th day of April, 2009 to the following:

Charles Murphy
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
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Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Cbeyond) Docket No. 090142-TP
Communications, LLC against AT&T)
Communications of the Southern States, LLC)
and AT&T Florida for alleged failure to pay)
intrastate access charges pursuant to Cbeyond's)
Price List and interconnection agreement)
and for alleged violation of Section 364.16(3)(a),)
Florida Statutes) Filed: April 29, 2009

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO AMENDED COMPLAINT**

AT&T Communications of the Southern States, LLC ("AT&T Communications"), and BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby file this Unopposed Motion for Extension of Time to Respond to the Amended Complaint. As grounds therefor, AT&T Communications and AT&T Florida state as follows:

1. On March 19, 2009, Cbeyond filed a Complaint in this case.
2. On April 1, 2009, Cbeyond filed an Amended Complaint in which it added AT&T Communications as a Respondent in this proceeding.
3. On April 2, 2009, a Joint Motion for Extension of Time to Respond to Amended Complaint and to any Required Responsive Pleading was filed requesting AT&T Communications and AT&T Florida to respond to the Amended Complaint by May 1, 2009, and making Cbeyond's responsive pleading, if any due on May 8, 2009.
4. On April 9, 2009, the Florida Public Service Commission ("Commission") entered Order No. PSC-09-0212-PCO-TP granting the Joint Motion.

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5. The parties are currently trying to resolve the matter without further Commission intervention and AT&T Communications and AT&T Florida request an additional extension of time to respond to the Amended Complaint by June 1, 2009. 2009.

6. Gene Watkins, counsel for Cbeyond Communications, LLC, has advised that Cbeyond is unopposed to the requested extension.

WHEREFORE, for the foregoing reasons, AT&T Florida and AT&T Communications request that the Prehearing Officer grant this motion extending the due date of AT&T Communications and AT&T Florida's response to the Amended Complaint to June 1, 2009 .

Respectfully submitted this 29th day of April, 2009.

AT&T FLORIDA AND AT&T
COMMUNICATIONS OF THE SOUTHERN
STATES, LLC



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