

**Dorothy Menasco**

**From:** WOODS, VICKIE (Legal) [vf1979@att.com]  
**Sent:** Friday, April 15, 2011 4:23 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** 110087-TP AT&T Florida's Motion for Extension of Time  
**Importance:** High  
**Attachments:** Document.pdf

A. Vickie Woods

BellSouth Telecommunications, Inc. d/b/a AT&T Florida

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(305) 347-5560

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B. Docket No.: 110087-TP: Notice of the Adoption of existing interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. d/b/a AT& T Florida d/b/a AT&T Southeast and Image Access, Inc. d/b/a New Phone, Inc. by Express Phone Service, Inc.

C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida  
 on behalf of Manuel A. Gurdian

D. 4 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Motion for Extension of Time  
 .pdf

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DOCUMENT NUMBER-DATE  
 02608 APR 15 =  
 FPSC-COMMISSION CLERK



Manuel A. Gurdian  
General Attorney

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April 15, 2011

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

**Re: Docket No. 110087-TP: Notice of the Adoption of existing interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. d/b/a AT& T Florida d/b/a AT&T Southeast and Image Access, Inc. d/b/a New Phone, Inc. by Express Phone Service, Inc.**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Motion for Extension of Time, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Manuel A. Gurdian

cc: All Parties of Record  
Jerry D. Hendrix  
Gregory R. Follensbee  
E. Earl Edenfield, Jr.

909733

**CERTIFICATE OF SERVICE**  
**Docket No. 110087-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 15<sup>th</sup> day of April, 2011 to the following:

Theresa Tan  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[ltan@psc.state.fl.us](mailto:ltan@psc.state.fl.us)

Express Phone Service  
Mr. Tom Armstrong  
1803 West Fairfield Drive, Unit 1  
Pensacola, FL 32501-1040  
Tel. No.: (850) 291-6415  
Fax No.: (850) 308-1151  
[tom@dei.qccoxmail.com](mailto:tom@dei.qccoxmail.com)

Keefe Law Firm  
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New Phone, Inc.  
Jim R. Dry  
5555 Hilton Avenue  
Suite 415  
Baton Rouge, LA 70808-2563  
Tel. No. (225) 214-4412  
Fax. No. (225) 214-4111  
[jjmdry@razorline.com](mailto:jjmdry@razorline.com)

  
\_\_\_\_\_  
Manuel A. Gurdian

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Notice of the Adoption of existing ) Docket No. 110087-TP  
interconnection, unbundling, resale, and )  
collocation agreement between BellSouth )  
Telecommunications, Inc. d/b/a AT& T )  
Florida d/b/a AT&T Southeast and Image )  
Access, Inc. d/b/a New Phone, Inc. by Express) )  
Phone Service, Inc. )  
\_\_\_\_\_ ) Filed: April 15, 2011

**MOTION FOR EXTENSION OF TIME TO RESPOND  
TO EXPRESS PHONE'S MOTION FOR SUMMARY FINAL ORDER**

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby files this Motion for Extension of Time to Respond to Express Phone Service, Inc.'s ("Express Phone") Motion for Summary Final Order ("Motion), dated April 12, 2011, in the captioned docket. As grounds therefor, AT&T Florida states as follows:

1. On April 12, 2011, Express Phone filed its Motion. Express Phone's Motion, with exhibits included, is over 90 pages in length.
2. AT&T Florida's Response to the Motion is currently due on April 19, 2011.
5. AT&T Florida requires additional time to respond to the Motion due to other pending litigation commitments and undersigned counsel being summoned to report to Jury Duty in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida on April 18, 2011.
6. Accordingly, AT&T Florida respectfully requests an extension of time of seven (7) days to respond to the Motion.

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7. Undersigned counsel attempted to contact Express Phone's counsel to ascertain whether Express Phone objected to the request; however, as of the filing of the Motion, AT&T Florida had not received a response.

WHEREFORE, for the foregoing reasons, AT&T Florida requests that the Prehearing Officer grant this motion extending the due date of AT&T Florida's response to the Motion to April 26, 2011.

Respectfully submitted this 15th day of April, 2011.

AT&T FLORIDA



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