

Marguerite McLean

From: jlparado@aol.com
Sent: Friday, August 05, 2011 4:48 PM
To: Filings@psc.state.fl.us; Jerry Hallenstein; Lisa Harvey; Pauline Robinson; Adam Teitzman
Subject: RE: Docket No. 090430-TP: STS . AT&T: STS Motion For Deferral of Conf. Agenda
Attachments: Docket #090430-TP STS Request for Deferral of 8-9-11 Agenda Conference STS 8-5-11-jlp.pdf

-----Original Message-----

From: jlparado <jlparado@aol.com>
To: filings <filings@psc.state.fl.us>; jhallens <jhallens@psc.state.fl.us>; lsharvey <lsharvey@psc.state.fl.us>; pevans <pevans@psc.state.fl.us>; ateitzma <ateitzma@psc.state.fl.us>
Sent: Fri, Aug 5, 2011 4:24 pm
Subject: RE: Docket No. 090430-TP: STS . AT&T: STS Motion For Deferral of Conf. Agenda

Please find attached: **Saturn Telecommunication Services, Inc.'S Unopposed Emergency Request To Defer Matter For Agenda Conference Agenda Scheduled For August 9, 2011**

Thank you for your attention to this matter.

James L. Parado, Esquire
Alan C. Gold, PA
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DOCUMENT NUMBER-DATE
05547 AUG-5 =
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

SATURN TELECOMMUNICATION }
SERVICES INC., a Florida }
corporation, }

Petitioner, }

v. }

BELLSOUTH }
TELECOMMUNICATIONS, INC., a }
Florida corporation, }
d/b/a AT&T }

Respondent. }

Docket No.090430-TP

Filed: August 5, 2011

RE: Amended Petition For Verified
Emergency Injunctive Relief and
Request to Restrict or Prohibit
AT&T From Implementing Its
CLEC OSS-Related Releases, by
Saturn Telecommunication Services, Inc.

**SATURN TELECOMMUNICATION SERVICES, INC.'S UNOPPOSED EMERGENCY
REQUEST TO DEFER MATTER FOR AGENDA CONFERENCE AGENDA
SCHEDULED FOR AUGUST 9, 2011**

Petitioner, SATURN TELECOMMUNICATION SERVICES INC. ("STS"), by and through the undersigned Counsel, pursuant to Rules 28-106.210 and 28-106.204, Fla. Admin. Code, hereby files this unopposed emergency request to defer the instant matter for Conference Agenda scheduled for August 9, 2011, and in support thereof states as follows:

1. On or about Friday, July 29, 2011, the Florida Public Service Commission ("Commission"), issued its Notice of Commission Conference Agenda, scheduled for August 9, 2011 at 9:30 a.m.
2. The Conference Agenda listed instant matter as the third item to be heard, Item No. 3.
3. As soon as was practicable, both STS and AT&T conferred in good faith on the matter in order to attempt resolution of the same, and believe they may be able to

resolve the instant matter amicably without further Commission action, other than administrative procedures to close the case.

4. STS and AT&T need an additional thirty (30) days to negotiate and agree on the details of a settlement.

WHEREFORE, SATURN TELECOMMUNICATION SERVICES, INC. requests that this Honorable Commission defer the instant matter, Item No. 3 on its Conference Agenda for August 9, 2011, allow at least thirty (30) days for the STS and AT&T to resolve all issues, continue this matter for the next available Conference Agenda, and for any other relief the Commission deems appropriate.

Respectfully Submitted

s/ Alan C. Gold

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James L. Parado (Florida Bar No. 580910)
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Counsel for STS

CERTIFICATE OF GOOD FAITH

I HEREBY CERTIFY that I have conferred with Counsel for Respondent, who states that he is unopposed to the instant Motion.

s/ Alan C. Gold
Alan C. Gold (Florida Bar No. 304875)

CERTIFICATE OF SERVICE

Docket No. 090430-TP

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail this 5th day of August, 2011 to the following:

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Adam J. Teitzman, Esquire
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s/ Alan C. Gold
Alan C. Gold (Florida Bar No. 304875)