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March 9, 1998

VIA OVERNIGHT MAIL

Ms. Blanco S. Bayo  
Director  
Division of Records and Reporting  
Florida Public Service Commission  
Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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\*\* UT BAR ONLY  
\*\*\* NY AND MA BARS ONLY

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98 MAR 10 AM 9:35  
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FLORIDA PUBLIC SERVICE COMMISSION

Re: Docket No. 971493-TI Initiation of show cause proceedings against All American Telephone, Inc. for violation of Rule 25-24.118, F.A.C., Interexchange Carrier Selection

Dear Ms. Bayo:

Transmitted herewith for filing on behalf of All American Telephone, Inc. is an original and fifteen (15) copies of its Motion for Further Extension of Time to Respond to Order to Show Cause, in the above-captioned docketed proceeding. So that we may have proof of this filing, please date stamp the additional copy of the Motion and return to this office in the enclosed self-addressed stamped envelope.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
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If there are any questions, please communicate directly with undersigned counsel for All American Telephone, Inc.

Sincerely,  
  
Mitchell F. Brecher  
Counsel for All American Telephone, Inc.

RECEIVED & FILED  
Enclosure  
FPSC-BUREAU OF RECORDS

74150.1/0952  
DOCUMENT NUMBER-DATE  
93043 MAR 10 98  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Initiation of show cause )  
proceedings against All American )  
Telephone, Inc. for violation of )  
Rule 25-4.118, F.A.C., )  
Interexchange Carrier Selection )

Docket No. 971493-TI

**MOTION FOR FURTHER EXTENSION OF TIME TO  
RESPOND TO ORDER TO SHOW CAUSE**

All American Telephone, Inc. (All American), by its attorneys, hereby moves the Commission to further extend the date for submission of its response to the order to show cause issued by the Commission in the above-captioned docketed proceeding. In support of this motion, All American states as follows:

By order issued February 10, 1998,<sup>1</sup> the Commission directed All American to show cause in writing within twenty days of the order's effective date as to why it should not be subject to sanctions for violation of Rule 25-4.118, Florida Administrative Code.<sup>2</sup> The deadline for responding to the order to show cause was to have been March 2, 1998.

Counsel for All American and the Commission Staff have been engaged in discussions in an attempt to resolve the issues set forth in the order to show cause without proceeding to hearing. On February 26, 1998, All American, by its undersigned counsel, filed with the Commission a motion requesting a fifteen day extension of time to respond to the order to show cause until March 17, 1998. Staff counsel was consulted in advance of the filing of that motion for extension of time, and indicated that Staff would not oppose that request.

Following a series of settlement discussions between All American and Staff, on March

<sup>1</sup>Order to Show Cause, Order No. PSC-98-0268-FOF-TI.

<sup>2</sup>*Id.* at 5.

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FPSC-RECORDS/REPORTING

9, 1998, All American submitted to Staff a formal proposal for settlement of this proceeding. All American understands that its proposal is under review by Staff which will decide whether or not to recommend to the Commission that the proceeding be settled under the terms proposed in All American's offer. At this point it cannot be determined what Staff's recommendation will be nor can it be determined when the Staff will make its recommendation or when the matter will be scheduled for consideration by the Commission at an agenda conference.

In order to permit the ongoing settlement negotiations to continue without prejudicing the interests either of All American or Staff, and in order to avoid the need for the parties to submit further requests for extension of time pending Staff and Commission consideration of the settlement proposal of All American, All American hereby respectfully moves the Commission for further extension of time to respond to the Order to Show Cause in this proceeding until twenty days following a Commission determination whether or not to approve the settlement proposal offered by All American. Staff counsel has been contacted and has indicated that it has no objection to this request.

Respectfully submitted,

ALL AMERICAN TELEPHONE, INC.



Mitchell F. Brecher  
FLEISCHMAN AND WALSH, L.L.P.  
1400 Sixteenth Street, NW  
Washington, DC 20036  
(202) 939-7900

*Its Counsel*

March 9, 1998

63496.1/0952

CERTIFICATE OF SERVICE

I, Antoinette M. Thorne, a secretary at the law firm of Fleischman and Walsh, L.L.P., hereby certify that a copy of the foregoing All American Telephone, Inc.'s "*Motion for Further Extension of Time to Respond to Order to Show Cause*" in Docket No. 971493-TI, was served this 9th day of March, 1998, via *overnight delivery* on:

William Cox, Esq.  
Legal Division  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

  
Antoinette M. Thorne