

RECEIVED-FPSC

Legal Department

MICHAEL P. GOGGIN
General Counsel

99 JUN -8 PM 4:41

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

RECORDS AND
REPORTING

ORIGINAL

June 8, 1999

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 981834-TP (FCCA Petition)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Time, which we ask that you file in the above-referenced matter.

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.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Sincerely,

Michael P. Goggin
Michael P. Goggin

cc: All Parties of Record
Marshall M. Criser III
William J. Ellenberg II

| | |
|-----|----------|
| AFA | _____ |
| APP | _____ |
| CAF | _____ |
| CMU | _____ |
| CTR | _____ |
| EAG | _____ |
| LEG | <u>3</u> |
| MAS | <u>3</u> |
| OFC | _____ |
| RRR | _____ |
| SEC | <u>1</u> |
| WAW | _____ |
| OTH | _____ |

DOCUMENT NUMBER-DATE

07052 JUN-8 99

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
Docket No. 981834-TP**

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

Facsimile this 8th day of June, 1999 to the following:

William Cox
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
(850) 222-2525
Attys. For FCCA

Andrew O. Isar
Telecommunications Resellers Assoc.
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335
Tel. No. (206) 265-3910
Fax. No. (206) 265-3912

Marsha Rule
Tracy Hatch
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(850) 425-6364
Attys. for AT&T

Richard D. Melson
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
(850) 425-2313
Atty. For MCI

Dulaney L. O'Roark
MCI Telecommunications Corporation
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488

Floyd Self
Norman H. Horton, Jr.
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street
Suite 701
Tallahassee, FL 32302-1876
Attys. for WorldCom

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
(202) 296-6650

Susan Huther
MGC Communications, Inc.
3301 Worth Buffalo Drive
Las Vegas, Nevada 89129
(702) 310-4272

Patrick K. Wiggins
Donna L. Canzano
Wiggins & Villacorta, P.A.
2145 Delta Boulevard
Suite 200
Tallahassee, FL 32303
Tel. No. (850) 385-6007
Fax. No. (850) 385-6008
Attys. for Intermedia

Norman H. Horton, Jr.
Messer, Caparelo & Self
215 South Monroe Street
Suite 701
Tallahassee, FL 32301-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Attys. for e.spire

James C. Falvey, Esq.
e.spire Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, Maryland 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Jerry Blumenfeld
Elise Kiley
Blumenfeld & Cohen
1615 M Street, N.W., Suite 700
Washington, D.C. 20036

Kimberly Caswell
GTE Service Corporation
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2606
Fax. No. (813) 204-8870

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson &
Dunbar, P.A.
Post Office Box 10095
Tallahassee, Florida 32302
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069

David Dimlich, Legal Counsel
Supra Telecommunications &
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4236
Fax. No. (305) 443-6638

Donna Canzano McNulty, Esq.
MCI WorldCom
325 John Knox Road
Suite 105
Tallahassee, FL 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
310 North Monroe Street
Tallahassee, FL 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112
Tel. No. (303) 476-4200

Florida Public Telecomm. Assoc.
Angela Green, General Counsel
125 South Gadsden Street
#200
Tallahassee, FL 32301-1525
Tel. No. (850) 222-5050
Fax. No. (850) 222-1355

Intermedia Communications, Inc.
Scott Sapperstein
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 621-0011
Fax. No. (813) 829-4923
Represented by Wiggins Law Firm

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515

Time Warner AxS of FL, L.P.
2301 Lucien Way
Suite 300
Maitland, FL 32751
Represented by Pennington Law Firm


Michael P. Goggin

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Competitive) Docket No. 981834-TP
Carriers for Commission Action)
To Support Local Competition)
In BellSouth's Service Territory)
_____) Filed: June 8, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR EXTENSION OF TIME**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files its Motion for Extension of time to file its response to the Motion for Independent Third Party Testing of BellSouth's Operational Support Systems and states its grounds in support thereof the following:

1. On May 28, 1999 the Florida Competitive Carriers Association ("FCCA") and AT&T Communications of the Southern States, Inc. ("AT&T") jointly filed a Motion for Independent Third Party Testing of BellSouth's Operational Support Systems ("the Motion").
2. BellSouth's response to the Motion is currently due on June 9, 1999. The Motion includes a detailed proposal for implementing third party testing. BellSouth believes that good cause exists for extending the date by which it must respond in view of the need to carefully analyze the proposal and thoughtfully respond.
3. Counsel for BellSouth has spoken with counsel for FCCA and has been authorized to state that neither FCCA nor AT&T objects to BellSouth's Motion for an extension of time.

DOCUMENT NUMBER-DATE

07052 JUN-88


FPSC-RECORDS/REPORTING

4. BellSouth is requesting an additional week to file its response. No party to this proceeding will be prejudiced by this extension. Thus, BellSouth requests that the time for filing the above-identified response be extended until June 16, 1999, and that the time for filing this response be tolled pending the Commission's decision on this Motion for Extension of Time.


WHEREFORE, BellSouth respectfully requests the entry of an order granting an extension of time as set forth above.

Respectfully submitted this 8th day of June, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (PW)
MICHAEL P. GOGGIN
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305) 347-5558



WILLIAM J. ELLENBERG II (PW)
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0711

166028