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August 30, 1999

BY HAND DELIVERY

Ms. Blanca Bayo, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re:

Docket No. 990970-TP

Dear Ms. Bayo:

Enclosed for filing on behalf of Association for Local Telecommunications Services, ("ALTS"), the Commercial Internet Exchange Association ("CIX"), the Competitive Telecommunications Association ("CompTel"), ACSI Local Services, Inc. d/b/a e.spire Communications, Inc., on behalf of its affiliates ("e.spire"), the Florida Competitive Carriers Association ("FCCA"), the Florida Internet Service Providers Association ("FISPA"), and the Telecommunications Resellers Association ("TRA") are an original and fifteen copies of the Motion for Extension of Time in the above captioned docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

AFA APP	· in the Committee of t	Sincerely,
CAF	March	Norman H. Horton, Jr.
MAS OPC PAI SEC WAW	NHH/amb Enclosure c: James C. Falvey, Esq. Parties of Record	
OTH		DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE 10345 AUG 30 #

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Complaint by Association for Local
Telecommunications, Services, Commercial
Internet Exchange Association, Competitive
Telecommunications Association, ACSI
Local Services, Inc. d/b/a e.spire Communications,
Inc., Florida Competitive Carriers Association,
Florida Internet Service Providers Association,
and Telecommunications Resellers Association
Against BellSouth Telecommunications, Inc.
regarding promotional practices and petition
for expedited relief.

Docket 990970-TP Filed: August 30, 1999

MOTION FOR EXTENSION OF TIME

Comes now the Association for Local Telecommunications Services, ("ALTS"), the Commercial Internet Exchange Association ("CIX"), the Competitive Telecommunications Association ("CompTel"), ACSI Local Services, Inc. d/b/a e.spire Communications, Inc., on behalf of its affiliates ("e.spire"), the Florida Competitive Carriers Association ("FCCA"), the Florida Internet Service Providers Association ("FISPA"), and the Telecommunications Resellers Association ("TRA") (collectively, "Joint Petitioners") and request an extension of time to file its reply to BellSouth's Motion and as grounds would show:

- 1. On August 16, 1999 BellSouth Telecommunications, Inc. filed a Motion to Dismiss, or In the Alternative, to Strike the Petition or For Summary Judgment. The response of the Joint Petitioners is due August 30, 1999.
- 2. Joint Petitioners request an extension of 2 days, until September 1, 1999, to file their response to allow for coordination of the reply among the parties.

DOCUMENT NUMBER-DATE

3. Undersigned counsel has contacted counsel for BellSouth and can represent that BellSouth would not object to the 2 day extension.

Respectfully submitted on this 30th day of August, 1999.

NORMAN H. HORTON, JR.

Messer, Caparello & Self, P.A.

P. O. Box 1876

Tallahassee, FL 32302-1876

(850) 222-0720

Attorneys for Joint Petitioners and e.spire Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Hand Delivery (*) to the following parties of record this 30th day of August, 1999:

Nancy B. White* c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301

Beth Keating, Esq.* Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

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Claude Pepper Building
111 W. Madison St., Room 812
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Norman H. Horton, Jr.