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November 11, 1999

VIA HAND DELIVERY

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

ORIGINAL

Re: *MediaOne Florida Telecommunications, Inc.* 990149-TP

Dear Ms. Bayo:

Please find enclosed for filing on behalf of MediaOne Florida Telecommunications, Inc., the following documents:

Original and 7 copies of our Motion to Stay Proceedings

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

I thank you very much for your assistance in this matter.

Very truly yours,


William B. Graham

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
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WBG/ktc
Encls.
cc: Susan Keesen
Dick Karre

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition by MediaOne
Florida Telecommunications,
Inc. for arbitration of an
interconnection agreement with
BellSouth Telecommunications,
Inc. pursuant to Section 252(b)
of the Telecommunications Act
of 1996.

DOCKET NO. 990149-TP

MOTION TO STAY PROCEEDINGS

COMES NOW, MediaOne Florida Telecommunications, Inc, ("MediaOne") by and through its undersigned counsel and hereby files with the Florida Public Service Commission this Motion to Stay Proceedings.

On October 14, 1999, the Florida Public Service Commission ("FPSC") filed its Final Order on Arbitration, Order No. PSC-99-2009-FOF-TP. On October 29, 1999, pursuant to Rule 25-22.060, Fla. Admin. Code, MediaOne filed its Motion for Reconsideration and Request to File Supplemental Authority. That Motion for Reconsideration was premised upon a recent decision by the Federal Communications Commission which bears directly upon the issues presented in this arbitration proceeding. Media One's Motion for Reconsideration is pending at this time.

A question has arisen as to whether the Final Order on Arbitration has been effectively stayed as a consequence of Media One's Motion for Reconsideration. The Final Order instructs the parties to submit written agreements implementing the findings contained within the Final Order within 30 days of the Order.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

Media One believes strongly that its Motion for Reconsideration is well founded and that this Commission will see fit to grant such motion. It will serve no purpose for the parties to expend the time and resources required to negotiate and prepare final written agreements memorializing the findings contained in the Final Order on Arbitration if that Order is altered due to the Motion for Reconsideration.

Rule 25-22.060(c) provides mixed direction on whether an order granting the instant motion for stay of proceedings is necessary. That provision states as follows:

A final order shall not be deemed rendered for the purpose of judicial review until the Commission disposes of any motion and cross-motion for reconsideration of that order, but this provision does not serve automatically to stay the effectiveness of any such final order. The time period for filing a motion for reconsideration is not told by the filing of any other motion for reconsideration.

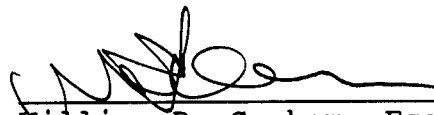
The underlined language cited above indicates that an appeal could not be filed while a motion or cross-motion for reconsideration is pending. That provision does not, however, constitute an automatic stay.

In light of the pending Motion for Reconsideration and the strong justification for reconsideration it appears that the parties should conserve their time and resources and refrain from entering into final agreements until this Court enters its order on MediaOne's Motion for Reconsideration.

WHEREFORE, for the reasons contained herein, MediaOne respectfully requests that this Court enter an order staying all further proceedings herein pending final resolution of the Motion

for Reconsideration.

Respectfully submitted, this 11th day of November, 1999.



William B. Graham, Esq.
Fla. Bar No. 359068
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101 N. Gadsden Street
Tallahassee, FL 32301
(850) 222-6656

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DOCKET NO. 990149-TP


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion to Stay
Proceedings has been furnished by Hand Delivery to:

Lee Fordham, Esq.
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

J. Phillip Carver
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, FL 32399

this 11th day of November, 1999.



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