# MCWHIRTER REEVES

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX PLEASE REPLY TO:

**TALLAHASSEE** 

February 14, 2000

TALLAHASSEE OFFICE:
117 SOUTH GASDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX COMMON CO

## BY HAND-DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re:

Docket Number 990691-TP

Dear Ms. Bayo:

On behalf of ICG Telecom Group, I am enclosing a the original (for filing) and fifteen additional copies (for distribution) of the following:

Motion for Extension of Time to Prepare Conforming Agreement.

Please acknowledge receipt of the above on the extra copy for return to my office.

Thank you for your assistance.

Yours truly,

Joseph A. McGlothlin

Joe a. Mislothler

AFA
APP
CAF
CMU \_\_IAM/jk
CTR \_\_enc.
EAG \_\_I
MAS \_\_3
OPC \_\_RRE\_\_\_I
SEC \_\_WAW \_\_\_\_\_\_\_

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In the Matter of:

Petition by ICG TELECOM GROUP, INC. for Arbitration of an Interconnection Agreement with BELLSOUTH TELECOMMUNICATIONS, INC. Pursuant to Section 252(b) of the Telecommunication Act of 1996

Docket No. 990691-TP

Filed: February 14, 2000

### ICG TELECOM GROUP, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO PREPARE CONFORMING AGREEMENT

ICG Telecom Group, Inc. (ICG), through its undersigned counsel, moves for an extension of the time within which the parties are to submit an agreement conforming to Order No. PSC-00-0128-FOF-TP issued by the Commission on January 14, 2000, and in support states:

- 1. In the Final Order on Arbitration, Order No. PSC-00-0128-FOF-TP, the Commission memorialized its decision in the above arbitration docket and directed BellSouth Telecommunications, Inc. (BellSouth) and ICG to submit an agreement conforming to its decision within 30 days of the order. The 30-day period expires on February 14, 2000.
- 2. ICG and BellSouth have been working diligently to prepare a conforming agreement, and much progress has been made. However, the parties require a short extension for the purpose of finalizing the document. Accordingly, ICG requests an extension of ten (10) days, or until February 24, 2000 for this purpose.
- 3. ICG is authorized to represent that BellSouth Telecommunications, Inc. supports and joins in this request.

WHEREFORE, ICG requests an extension until February 24, 2000 for the purpose of

DOCUMENT NUMBER-DATE

01924 FEB 148

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## submitting an agreement conforming to Order No. PSC-00-0128-FOF-TP.

Joseph A. McGlothlin

Vicki Gordon Kaufman

McWhirter, Reeves, McGlothlin,

Davidson, Decker, Kaufman,

Arnold & Steen, P.A.

117 South Gadsden Street

Tallahassee, Florida 32301

Telephone: (850)222-2525

Telecopy: (850)222-5606

Attorneys for ICG Telecom Group, Inc.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy ICG Telecom Group, Inc.'s Motion for Extension of Time to Prepare Conforming Agreement has been furnished by hand-delivery\* and by United States mail this 14th day of February, 2000 to:

\*Lee Fordham
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Gunter Building, Room 370
Tallahassee, FL 32399

\*Nancy B. White Michael P. Goggin c/o Nancy Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301

Joseph A. McGlothlin