

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition for Arbitration of an Interconnection)
Agreement Between BellSouth Telecommunications,)
Inc. and US LEC of Florida Inc. Pursuant to the)
Telecommunications Act of 1996)
_____)

Docket No. 000084-TP
Filed: February 14, 2000

MOTION FOR EXTENSION OF TIME

US LEC of Florida Inc. ("US LEC"), by its undersigned counsel, and pursuant to Rule 1.090(b), Florida Rules of Civil Procedure, hereby requests an extension of time of ninety (90) days to respond to the Petition of BellSouth Telecommunications, Inc. ("BellSouth") for arbitration of unresolved issues in the negotiation of an interconnection agreement between US LEC and BellSouth. In accordance with Section 252(b)(3) of the Telecommunications Act, 47 U.S.C. § 252(b)(3), a response to BellSouth's arbitration Petition must be filed with the Commission by February 19, 2000. Concurrent with this request, US LEC also consents to an extension of the Commission's deadline, contained in Section 252(b)(4)(C) of the Telecommunications Act, 47 U.S.C. § 252(b)(4)(C), for the resolution of disputed interconnection agreement issues by ninety (90) days. BellSouth agrees with this request.

The Commission currently is in the final stages of several proceedings relating to the arbitration of unresolved issues in the negotiation of interconnection agreements between BellSouth and certain other carriers. Many of the issues addressed in these proceedings are similar to those that US LEC and BellSouth thus far have been unable to resolve in the negotiation of their interconnection agreement. In order to avoid having the Commission re-arbitrate these same issues, the Parties are interested in awaiting the final approval of interconnection agreements resulting from the Commission's other arbitration proceedings.

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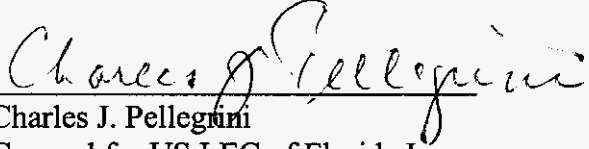
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Pursuant to Section 252(i) of the Telecommunication Act, 47 U.S.C. § 252(i), US LEC is considering opting into such future agreements, to the extent applicable. The requested extension of time will permit the Parties to review the agreements resulting from other arbitration proceedings, and avoid duplicative litigation of similar issues.

WHEREFORE, US LEC respectfully requests that Commission extend the deadline for filing a response to BellSouth's arbitration Petition by ninety (90) days and extend the Commission's deadline for the resolution of disputed interconnection agreement issues by an equal amount. In light of the February 19, 2000, statutory deadline for filing a response to BellSouth's arbitration Petition, US LEC also respectfully requests that the Commission grant this Motion on an expedited basis, no later than February 15, 2000.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been served by hand delivery this 14th day of February 2000, on the following:

E. Earl Edenfield
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301


Charles J. Pellegrini