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RECORDS AND REPORTING

April 12, 2000

ORIGINAL

**BY HAND DELIVERY**

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

Re: Docket No. 990649-TP

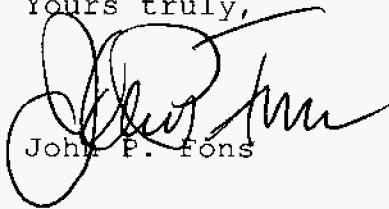
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint-Florida, Inc.'s Motion for Extension of Time and/or Acknowledgment of Late-Filing of Certain Cost Studies.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Yours truly,



John P. Fons

Enclosures

cc: All parties of record

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DOCUMENT NUMBER-DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation into pricing ) Docket No. 990649-TP  
of unbundled network elements ) Filed: April 12, 2000  
\_\_\_\_\_ )

MOTION FOR EXTENSION OF TIME AND/OR ACKNOWLEDGEMENT  
OF LATE-FILING OF CERTAIN COST STUDIES

Sprint-Florida, Incorporated (Sprint), by and through its undersigned attorneys, hereby requests that the Florida Public Service Commission grant an extension of time for and/or acknowledge the late-filing of recurring cost studies for three Unbundled Network Elements (UNEs) - Dark Fiber, DS3 Interoffice Transport and Packet Switching. The request is made because Order No. PSC-00-0540-PCO-TP, issued March 16, 2000 ("Order") requires that Sprint file the recurring cost studies for UNEs by April 17, 2000. Sprint has determined that it cannot meet that deadline. In support of the motion Sprint states as follows:

1. At the time the Order was issued, Sprint was (and is) also a signatory to a stipulation that it would file recurring cost studies for all elements, including the three that are the subject of this Motion. See, Order No. PSC-99-2467-PCO-TP, Issued December 17, 2000. The Order incorporated the agreement contained in the Stipulation. Sprint has never performed cost studies for these elements. Unfortunately, as Sprint has

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attempted to perform the cost studies along with the studies for the more conventional UNEs, it has become apparent that the studies are more complicated than first thought. Sprint now estimates that it will take another 2 weeks to prepare the studies. This would mean that the three UNE recurring cost studies at issue could be filed on May 1, 2000.

2. Sprint came to this realization too late to seek timely relief from the Order's timeframes. Regardless of whether the Motion is granted, Sprint will be unable to file the aforesaid cost studies. For this reason, Sprint was reluctant to file this motion. Sprint wants to make it clear that this motion is not being filed frivolously or in disregard of the Order, but rather to put the Commission and parties on notice that there will be a short delay in the filing of these novel cost studies. Sprint also urges that the Commission acknowledge the late filing in the event that the response time frames and logistics of ruling on the motion place the decision date past the Order-established due date of April 17, 2000.

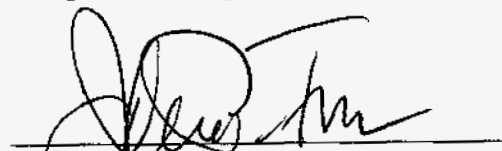
3. Sprint does not believe that a two-week delay will materially impact the parties in this case. Sprint has transmitted a non-disclosure agreement to the parties so that there will be no delay in receiving the studies. The subject cost studies will be delivered by overnight mail to all parties who qualify by signing the non-disclosure agreement. Of course,

Sprint will provide all other recurring cost studies to the qualifying parties concurrent with filing the studies with the Commission on April 17.

WHEREFORE, for the above reasons, Sprint respectfully requests that the Commission grant an extension of time for the filing of the recurring cost studies for Dark Fiber, DS3 Interoffice Transport and Packet Switching UNEs until May 1, 2000. In the alternative, Sprint asks that the Commission acknowledge the late filing of these studies if a timely order granting the extension cannot be issued.

DATED this 12<sup>th</sup> day of April, 2000.

Respectfully submitted,



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and

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ATTORNEYS FOR SPRINT-FLORIDA,  
INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission, U. S. Mail, or hand delivery (\*) this 12<sup>TH</sup> day of April, 2000, to the following:

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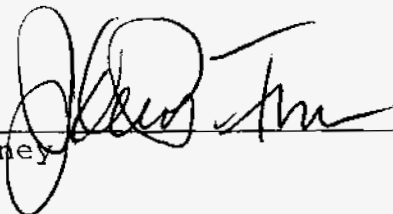
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