ORIGINAL

RECEIVED-FPSC

Legal Department

Michael P. Goggin General Attorney 00 OCT 18 PM 4: 27

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561 RECONDS AND REPORTING

October 18, 2000

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

Re: Docket No. 991220-TP (Global NAPS Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Agreed Motion for Extension of Time, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Michael P. Goggin

(2K)

cc: All Parties of Record Nancy B. White Marshall M. Criser III R. Douglas Lackey

RECEIVEDAYILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13279 OCT 188

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE Docket No. 991220-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail and (*) Facsimile this 18th day of October, 2000 to the following:

Beth Keating (*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6199
Fax No. (850) 413-6250

Christopher W. Savage, Esq. Cole, Raywid & Braverman 1919 Pennsylvania Avenue, N.W. Suite 200 Washington, D. C. 20006 Tel. No. (202) 828-9811 Fax. No. (202) 452-0067

William J. Rooney, Jr., Esq. General Counsel Global NAPs South, Inc. Ten Merrymount Road Quincy, MA 02169
Tel. No. (617) 507-5111
Fax. No. (617) 507-5211

Steven Klimacek
BellSouth Telecommunications, Inc.
675 West Peachtree Street
Suite 4300, Southern Bell Center
Atlanta, GA 30375
Tel. No. (404) 335-0780
Fax. No. (404) 614-4054

Jon C. Moyle, Jr. (*)
Moyle Flanigan Katz Kolins
Raymond & Sheehan, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828

vlichael P. Goggin

ÓRIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)	Docket No. 991220-TP
Petition by Global NAPs, Inc. for Arbitration of Interconnection Rates, Terms and Conditions and Related Relief of Proposed Agreement with BellSouth Telecommunications, Inc)	Filadi Ostabar 10, 2000
	}	Filed: October 18, 2000

Agreed Motion for Extension of Time

BellSouth Telecommunications, Inc. ("BellSouth") and Global NAPs, Inc. ("Global NAPs") by their undersigned counsel, submit this Agreed Motion for Extension of time ("Motion") and in support thereof state as follows:

- 1. On September 19, 2000, the Commission issued its Final Order on Arbitration, Order No. PSC-00-1680-FOF-TP, in this proceeding. Therein, the Commission ordered the parties to submit a signed agreement compliant with its decisions within thirty days of the issuance of the order.
- 2. On October 17, 2000, BellSouth's office spoke to Global NAP's counsel and he has agreed that due to the pending motions for reconsideration filed by the parties in this docket, BellSouth, and Global NAPs, believe it would be appropriate to extend the time for filing a new interconnection agreement until 30 days after the Commission has ruled on those motions.
- 3. Thus, the parties hereby request that the Commission grant an extension of time 30 days after the Commission issues an Order on the pending motions for reconsideration, for the submission of a signed agreement for the Commission's approval.

DOCUMENT NUMBER-DATE
13279 OCT 188

FPSC-RECORDS/REPORTING

Respectfully submitted this 18th day of October, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY BAWHITE

MICHAEL P. GOGGIN c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5555

R. DOUGLAS LACKEY

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0747

232596