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December 12, 2000

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

Docket #990750-TP; Petition for Arbitration by ITC^DeltaCom Communications

Dear Ms. Bayo:

Re:

MAIN OFFICE:

1983 CENTRE POINTE BOULEVARD

SUITE 200 TALLAHASSEE, FLORIDA 32308

FAX: (850) 222-2593

On behalf of Petitioner ITC^DeltaCom Communications, Inc., enclosed for filing are an original and 15 copies of an Agreed Motion for Extension of Time and a Notice of Address Change. Please file stamp the extra enclosed copies and return them to our runner. Thank you for your assistance.

Sincerely,

HUEY, GUILDAY & TUCKER, P.A.

BY HAND DELIVERY THIS

J. Andrew Bertron, Jr.

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Enclosures

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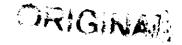
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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by ITC^DeltaCom	)	
Communications, Inc. d/b/a ITC^DeltaCom	)	Docket No. 990750-TP
for Arbitration of Certain Unresolved Issues in	)	
Interconnection Negotiations Between	)	
ITC^DeltaCom and BellSouth	)	
Telecommunications, Inc.	)	

### Agreed Motion for Extension of Time

ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom ("ITC^DeltaCom") and BellSouth Telecommunications, Inc., ("BellSouth") by their undersigned counsel, submit this Agreed Motion for Extension of Time ("Motion") and in support thereof state as follows:

- 1. On November 22, 2000, the Commission issued its Final Order on Arbitration, Order No. PSC-00-2233-FOF-TP, in this proceeding. Therein, the Commission ordered the parties to submit a signed interconnection agreement compliant with its decisions within twenty days of the issuance of the Final Order.
- 2. On December 6, 2000, BellSouth's office contacted ITC^DeltaCom's counsel and the Parties agreed that because the interconnection agreement has not been completed and due to the upcoming holidays, it would be appropriate to request from the Commission an extension of the time for filing a new interconnection agreement until 30 days from December 12, 2000.
- 3. ITC^DeltaCom is authorized to represent that BellSouth joins in and consents to this motion. Thus, the parties hereby request that the Commission grant an extension of time of 30 days from December 12, 2000 for filing the interconnection agreement.

DOCUMENT NUMBER-DATE

### Respectfully submitted this 12th day of December, 2000.

J. Michael Huey (Fla. Bar # 0130971)
J. Andrew Bertron, Jr. (Fla. Bar # 982849)
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Huntsville, Alabama 35802

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Attorneys for ITC^DeltaCom

# CERTIFICATE OF SERVICE DOCKET NO. 990750-TP

I hereby certify that a true and correct copy of the foregoing has been furnished to the following this 12th day of December, 2000:

Diana Caldwell
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
By Hand Delivery

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By Facsimile and U.S. Mail

Attorney

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