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TALLAHASSEE

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

February 14, 2002

VIA HAND DELIVERY

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

Re: Docket No.: 011119-TP

Dear Ms. Bayo:

On behalf of XO Florida, Inc., enclosed for filing and distribution are the original and 15 copies of the following:

• XO Florida, Inc.'s Motion for Extension of Time to File Testimony.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Orcen Anden Daufman

Vicki Gordon Kaufman

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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by XO Florida, Inc. for arbitration of Unresolved issues with BellSouth Telecommunications, Inc.

Docket No.: 011119-TP Filed: February 14, 2002

XO Florida, Inc.'s Motion for Extension of Time to File Testimony

XO Florida, Inc. (XO), pursuant to rule 28-106.204, Florida Administrative Code, files this motion for an extension of time for the filing of direct testimony in this matter as set forth below. As grounds therefor, XO states:

1. The current schedule in this matter calls for all direct testimony to be filed on February 19, 2002 and all rebuttal testimony to be filed on March 26, 2002. XO requests that the date to file direct testimony be extended to March 12, 2002. The date to file rebuttal testimony will remain March 26, 2002.

2. The requested extension will be helpful as the parties continue to attempt to settle outstanding issues in this arbitration. On February 4, 2002, XO served its responses to BellSouth's First Set of Interrogatories and Requests for Production of Documents. On February 5, 2002, after BellSouth executed a Non-Disclosure Agreement with XO, XO served its confidential responses to BellSouth's discovery. Since then, XO's confidential discovery responses have been solely in the possession of BellSouth's attorneys. Today, BellSouth's technical personnel signed the Non-Disclosure Agreement and gained access to XO's confidential responses. The requested extension of time will allow BellSouth's technical personnel time to review XO's confidential discovery responses. The parties are hopeful that following BellSouth's review of XO's confidential discovery responses, additional issues can be settled, thus obviating the need for the filing of testimony as to

certain issues and narrowing the issues which will be the subject of this proceeding. The requested extension for filing direct testimony will thus promote a more efficient and expeditious proceeding.

3. XO does not suggest any change in any of the other dates, including the date for the prehearing conference and hearing.

4. XO has consulted with counsel for BellSouth Telecommunications, Inc. (BellSouth) and is authorized to represent that BellSouth has no objection to the extension requested herein.

WHEREFORE, XO requests that the due date for direct testimony be extended to March 12, 2002.

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Attorneys for XO Florida, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing XO Florida, Inc.'s Motion for Extension of Time to File Testimony has been furnished by (*) hand delivery or by U. S. Mail on this 14th day of February, 2002, to the following:

(*) Jason Fudge Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

James Meza BellSouth Telecommunications, Inc. 150 West Flager Street Suite 1910 Miami, Florida 33130

Patrick Turner BellSouth Telecommunications, Inc. 675 West Peachtree Street, Suite 430 Atlanta, Georgia 30375

Ulilu Indri Daufman Vicki Gordon Kaufman