

MEMORANDUM

March 7, 2002

TO:

DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE

SERVICES

FROM:

office of the general counsel (christensen) Σ

RE:

DOCKET NO. 000028-TP - PETITION BY BELLSOUTH TELECOMMUNICATIONS, INC. FOR WAIVER OF RULES 25-4.107, 25-4.108, AND 25-4.113, F.A.C., WHICH REQUIRE PROVISION OF BASIC TELECOMMUNICATIONS SERVICE TO CERTAIN LOCATIONS

AND PERSONS.

Please place the attached note and Motion for Extension of Time to File Brief, sent to this office from Anthony Parks via facsimile on March 4, 2002, in the above-referenced docket.

PAC/lw Attachment

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DOCUMENT NUMBER - DATE

02675 MAR-78

Anthony Parks
P.O. Box 812283

Boca Raton, FL 33481 561-338-5937 aston28p@aol.com

To: Public Service Commission Patty Christensen

You will find enclosed a copy of my motion as we discussed earlier.

Thank You Anthony Parks

3/4/02

Anthony Parks

P.O. Box 812283 Boca Raton, FL 33481 561-338-5937

3/4/02

CC: James Mezza Bell South 40Mm: Panasonic PPF

STATE OF FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 000028-TL

MOTION FOR EXTENSION OF TIME TO FILE BREIF

Respondent is hereby requesting a 30 day extension to file brief in this matter, which is due on March 4, 2002 for the following reasons:

ONE

Respondent needs further time to obtain counsel, and has consulted with several attorneys, but Only one was willing to handle the matter that has any knowledge of Public Service Commission regulations.

TWO

Preliminary research has divulged that the waiver that Bell South is requesting does not fall.

Under the guidelines as to what it was intended for and that the commission does not have the authority.

To enforce this waiver against an individual.

This matter involves the legislature of the Sate of Florida and the attorney needs to meet with Them to finalize this matter.

CONCLUSION

In order to properly represent the issues properly more time will be needed to properly Research this matter since this has never been addressed before.

I have contacted James Mezza's office of Bell South however I am told that Mr. Mezza

Is out of town. Therefore I can not get his concurrence or objection.