NANCY B WHITE General Counsel-Florida

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558

July 9, 2002

Mrs. Blanca S. Bayó Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

## Re: <u>Docket No.: 020415-TL</u> Petition for Declaratory Statement Regarding Sprint PCS' Service Request

Dear Ms. Bayó:

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

Mancy B. Hhite Naticy B. White

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

> DOCUMENT NUMPER-DATE 07063 JUL-98 FPSC-COMMISSION CLERK

. . (

## CERTIFICATE OF SERVICE Docket No. 020415-TL

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

Federal Express this 9th day of July, 2002 to the following:

Martha Brown Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Monica M. Barone, Esq. Legal and Regulatory Affairs Sprint PCS 6391 Sprint Parkway Mail Stop: KSOPHT0101-Z2060 Overland Park, KS 66251 Tel.: (913) 315-9134 Fax.: (913) 315-0785 mbaron02@sprintspectrum.com

Kenneth A. Hoffman, Esq. Rutledge, Ecenia, Purnell & Hoffman 215 South Monroe Street Suite 420 Tallahassee, FL 32302 Tel.: (850) 681-6788 Fax: (850) 681-6515 Represents NE Telephone Ken@Reuphlaw.com

Susan S. Masterton Sprint P.O. Box 2214 Tallahassee, FL 32316-2214 Tel. No. (850) 599-1560 Fax. No. (850) 878-0777 Susan.masterton@mail.sprint.com Joel Margolis Nextel Communications, Inc. 2001 Edmund Halley Drive Room #A 4017B Reston, Virginia 20191 Tel. No. (703) 433-4223 Fax. No. (703) 433-4035 joel.margolis@nextel.com

Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Decker, Kaufman Arnold & Steen, PA 117 South Gadsden Street Tallahassee, Florida 32301 Tel. No. (850) 222-2525 Fax. No. (850) 222-5606 Attorney for Nextel vkaufman@mac-law.com

Nancy B. White

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

)

Petition for Declaratory Statement before the Florida Public Service Commission by BellSouth Telecommunications, Inc. regarding Sprint PCS' Service Request

Docket No.: 020415-TL

-

Filed: July 9, 2002

## BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.204(5), Florida Administrative Code, requests that the Florida Public Service Commission ("Commission") grant it a seven (7) day extension of time or until July 17, 2002, in which to respond to Nextel Communications, Inc.'s ('Nextel") Motion to Dismiss. In support of this motion, BellSouth states the following:

1. On July 3, 2002, Nextel filed its Motion to Dismiss and Opposition to the Petition for Declaratory Statement by BellSouth Telecommunications, Inc. Nextel served the Motion to Dismiss on BellSouth via hand delivery on that same date. Accordingly, under Rules 28-106.204(5) and 28-106.103, Florida Administrative Code, BellSouth's response is due on July 10, 2002, seven (7) days from service.

2. Because of the recent holiday and other commitments, BellSouth needs additional time to adequately respond to Nextel's Motion to Dismiss.

3. Nextel would not be prejudiced by a seven (7) day extension of time and the Commission would benefit from receiving an informed response to the Motion to Dismiss.

DOCUMENT NUMBER-DATE 07063 JUL-98 FPSC-CONIMISSION CLERK 4. Nextel's counsel represented to BellSouth that Nextel would not object to said extension of time.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that the Commission grant it a seven (7) day extension of time or until July 17, 2002 in which to respond to Nextel's Motion to Dismiss.

Respectfully submitted this 9th day of July, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B/WHITE

JAMES MEZA III c/o Nancy H. Sims 150 So. Monroe Street, Suite 400 Tallahassee, FL 32301 (305) 347-5558

R. DOUGLAS LACKEY (24) E. EARL EDENFIELD JR. Suite 4300 675 W. Peachtree St., NE Atlanta, GA 30375 (404) 335-0763

453942v.1