ORIGINAL

Legal Department

Nancy B. White General Counsel - Florida

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

November 15, 2002

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

Docket No. 020119-TP Re:

> Petition of Florida Digital Network, Inc. for Expedited Review and Cancellation of BellSouth Telecommunications, Inc.'s Key Customer Promotional **Tariffs** and For an Investigation BellSouth Telecommunications, Inc.'s Promotional Pricing and Marketing Practices

Docket No.: 020578-TP

Petition for Expedited Review and Cancellation of BellSouth Telecommunications, Inc's Key Customer Promotional Tariffs

Dear Ms. Bayó:

AUS CAF CMP

OTR -

GCL OPC

OTH___

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 captioned dockets.

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

Enclosures

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

RECEIVED & FILED

DOCUMENT NUMBER-DATE

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CERTIFICATE OF SERVICE DOCKET NO. 020119-TP and 020578-TP

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

Electronic Mail and U.S. Mail this 15th day of November 2002 to the following:

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Nancy B. White (LCA)

(+) Signed Protective Agreement

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for expedited review and
Cancellation of BellSouth Telecommunications,)
Inc.'s Key Customer promotional tariffs and for)
Investigation of BellSouth's promotional pricing)
and marketing practices, by Florida Digital)
Network, Inc.)

In Re: Petition of the Florida Competitive)
Carriers Association for Expedited Review and)
Cancellation of BellSouth Telecommunications)
Inc.'s Key Customer Promotional Tariffs)

Dated: November 15, 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 six (6) day extension of time or until November 25, 2002, in which to file Rebuttal Testimony and Prehearing Statements. In support of this motion, BellSouth states the following:

- 1. Pursuant to the Order Establishing Procedure, issued on September 23, 2002, Order No. PSC-02-1295-PCO-TP, Rebuttal Testimony and Prehearing Statements are due to be filed on November 19, 2002.
- 2. Because of previous work commitments, including filings and hearings in other states, BellSouth needs additional time to file Rebuttal Testimony and Prehearing Statements in the captioned dockets.

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- 3. The Parties would not be prejudiced by a six (6) day extension of time. Further, BellSouth would not object to all parties receiving a similar extension.
- 4. BellSouth has contacted all parties to the proceeding to ascertain their position as to BellSouth's request. All parties with the exception of Time Warner have consented. Time Warner has not responded at the time of the filing of this Motion.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that the Commission grant it, and all other parties, a six (6) day extension of time or until November 25, 2002, in which to file Rebuttal Testimony and Prehearing Statements.

Respectfully submitted this 15th day of November, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

NÀNCY B. WHITE

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