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July 16, 2003

#### BY HAND DELIVERY

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

Re: Docket No. 011354-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Motion for Continuance on behalf of ALLTEL Florida Inc.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

J. Jeffry Wahler

**Enclosures** 

cc: All parties of record

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DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

# ORIGINAL

#### BEFORE THE FLORDIA PUBLIC SERVICE COMMISSION

In the Matter of:	)
Global NAPs, Inc.	) ) ) Docket No. 011354-TP
Petition for Arbitration Pursuant to 47 U.S.C. § 252(b) of Interconnection, Rates, Terms and Conditions with	) ) )
ALLTEL Florida, Inc.	) Filed: July 16, 2003
	<i>1</i>

#### AGREED MOTION FOR CONTINUANCE

ALLTEL Florida, Inc. ("ALLTEL"), by and through its undersigned counsel, and pursuant to Rule 28-106.204, Florida Administrative Code, hereby request that the Florida Public Service Commission ("FPSC" or "Commission") continue the final hearing in this docket and reschedule it to a later date as may be necessary, and states:

- 1. The final hearing in this docket is scheduled for July 25, 2003.
- 2. On July 9, 2003, the Commission issued its Order no. PSC-03-0805-FOF-TP, in Docket No. 011666-TP, In re: Petition of Global NAPS, Inc. for Arbitration Pursuant to 47 U.S.C. 252(b) of Interconnection Rates, Terms and Conditions with Verizon Florida, Inc.
- 3. The requested continuance will allow the parties to exchange information as may be necessary for a full hearing and to allow the parties to continue to discuss the issues to determine if any of the issues can be resolved or refined.

DOCUMENT NUMBER-DATE

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4. The undersigned counsel for ALLTEL has discussed this motion with Jim Scheltema, counsel for Global NAPS, Inc., and is authorized by Mr. Scheltema to represent that Global NAPS, Inc. agrees to this motion.

DATED this 16<sup>th</sup> day of July, 2003.

ALLTEL Florida, Inc.

Stephen T. Refsell Vice President - Law ALLTEL Corporate Services, Inc. One Allied Drive Little Rock, AR 72202 501-905-5637 (Telephone) 501-905-5489 (Fax)

and

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or

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jwahlen@ausley.com

Attorneys for ALLTEL Florida, Inc.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 16<sup>th</sup> day of July, 2003, to the following:

Adam Tietzman \*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

William J. Rooney, Jr. Vice President & General Counsel Global NAPS, Inc. 89 Access Road Norwood, MA 02062 James R.J. Scheltema Director – Regulatory Affairs Global NAPs, Inc. 5042 Durham Road West Columbia, MD 21044

Jon C. Moyle, Jr. \*
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