

JAMES MEZA III  
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January 24, 2005

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: 041114-TP – Complaint of XO Florida, Inc. Against  
BellSouth Telecommunications, Inc. for Refusal to Convert  
Circuits to UNEs and for Expedited Processing**

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Dear Ms. Bayó:

Enclosed is a Joint Motion for Extension of Time to respond to Staff discovery, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
James Meza III (BSS)

Enclosures

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

**CERTIFICATE OF SERVICE  
DOCKET NO. 041114-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 24th day of January, 2005 to the following:

Jason Rojas  
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Represents XO

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James Meza III (BSS)

**(+) SIGNED PROTECTIVE AGREEMENT**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Complaint of XO Florida, Inc. ) Docket No.: 041114-TP  
Against BellSouth Telecommunications, Inc. for )  
Refusal to Convert Circuits to UNEs and for )  
Expedited Processing )  
\_\_\_\_\_ ) Filed: January 24, 2005

**JOINT MOTION FOR EXTENSION OF TIME**

BellSouth Telecommunications, Inc. ("BellSouth") and XO Florida, Inc. ("XO"), pursuant to Rule 28-106.204(5), Florida Administrative Code, jointly request that the Florida Public Service Commission ("Commission") grant them a one week extension of time or until February 8, 2004 in which to file Responses to Florida Public Service Commission Staff's ("Staff") Second Set of Interrogatories and Second Request For Production to the parties. In support of this motion, the parties state the following:

1. Staff served its Second Set of Interrogatories and Second Request For Production on BellSouth and XO on January 12, 2005. Pursuant to Order No. PSC-04-1147-PCO-TP ("Procedural Order"), objections and responses to this discovery are due February 1, 2005.

2. BellSouth requests this extension of time because the undersigned was in a multi-day hearing in North Carolina the week the discovery was issued, was preparing rebuttal testimony and appearing in Tennessee for a hearing the following week, and will be in Tennessee for a hearing the week prior to the date the discovery responses are due. Accordingly, BellSouth has not had sufficient time to review and prepare responses to the multiple discovery requests propounded by Staff.

3. XO requests an extension of time because the Staff requests are extensive and detailed. The XO personnel responsible for gathering the information will need additional time beyond the expedited 20 day time frame to compile, review and complete the responses.

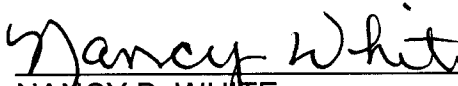
4. No party would be prejudiced by this brief extension of time.

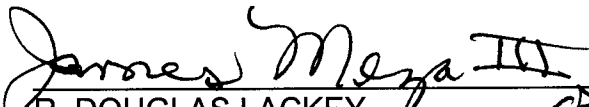
5. The parties have notified Staff of this request for the extension of time and Staff has no objections.

**WHEREFORE**, for the foregoing reasons, the parties respectfully request that the Commission grant BellSouth and XO a one week extension of time in which to file the aforementioned objections and responses.

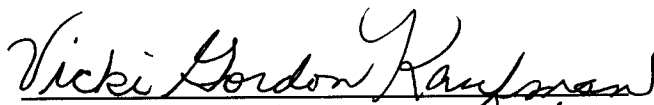
Respectfully submitted this 24th day of January, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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