

**Timolyn Henry**

---

**From:** terry.scobie@verizon.com  
**Sent:** Tuesday, June 13, 2006 8:45 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** de.oroark@verizon.com; David Christian; frank.app@verizon.com;  
demetria.c.watts@verizon.com  
**Subject:** Docket No. 020960-TP - Verizon Florida/Covad Joint Motion for Extension of Time  
**Attachments:** 020960 Joint Motion\_for\_Extension 6-13-06.pdf



020960 Joint  
Motion\_for\_Extens...

The attached filing is submitted in Docket No. 020960-TP on behalf of Verizon Florida Inc. and Covad Communications Company by

Dulaney L. O'Roark III  
Six Concourse Parkway  
Suite 600  
Atlanta, Georgia 30328  
(770) 284-5498  
de.oroark@verizon.com

The attached .pdf document contains 4 pages - transmittal letter (1 page), certificate of service (1 page), and Joint Motion for Extension of Time (2 pages).

(See attached file: 020960 Joint Motion\_for\_Extension 6-13-06.pdf)

Terry Scobie  
Executive Adm. Assistant  
Verizon Legal Department  
813-483-2610 (tel)  
813-204-8870 (fax)  
terry.scobie@verizon.com

CMP \_\_\_\_\_

COM 1

CTR \_\_\_\_\_

ECR \_\_\_\_\_

GCL \_\_\_\_\_

OPC \_\_\_\_\_

RCA \_\_\_\_\_

SCR \_\_\_\_\_

SGA \_\_\_\_\_

SEC 1

OTH Kim P.

ORIGINAL



Dulaney L. O'Roark III  
Vice President-General Counsel, Southeast Region  
Legal Department

Six Concourse Parkway  
Suite 600  
Atlanta, Georgia 30328

Phone 770-284-5498  
Fax 770-284-5488  
[de.oroark@verizon.com](mailto:de.oroark@verizon.com)

June 13, 2006 – VIA ELECTRONIC MAIL

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

Re: Docket No. 020960-TP  
Petition for Arbitration of open issues resulting from interconnection negotiations  
with Verizon Florida Inc. by DIECA Communications, Inc. d/b/a Covad  
Communications Company

Dear Ms. Bayo:

Enclosed for filing in the above matter is a Joint Motion for Extension of Time on behalf  
of Verizon Florida Inc. and DIECA Communications, Inc. d/b/a Covad Communications  
Company. Service has been made as indicated on the Certificate of Service. If there  
are any questions regarding this filing, please contact me at 770-284-5498.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

tas

Enclosures

DOCUMENT NUMBER - DATE

05072 JUN 13 8

FPSC-COMMISSION CLERK

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Joint Motion for Extension of Time in  
Docket No. 020960-TP were sent via U.S. mail on June 13, 2006 to

Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Anthony Hansel  
Covad Communications Company  
600 14<sup>th</sup> Street, NE, Suite 750  
Washington, DC 20005

Charles E. Watkins  
Covad Communications Company  
1230 Peachtree Street, NE, Suite 1900  
Atlanta, GA 30309-3578

Aaron Panner/Scott Angstreich  
Kellogg Huber Law Firm  
1615 M Street, NW, Suite 400  
Washington, DC 20036

Vicki Gordon Kaufman  
Moyle Flanigan Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301

s/ Dulaney L. O'Roark III

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Arbitration of open issues ) Docket No. 020960-TP  
resulting from interconnection negotiations )  
with Verizon Florida Inc. by DIECA )  
Communications, Inc. d/b/a Covad )  
Communications Company )  
\_\_\_\_\_ )

**JOINT MOTION FOR EXTENSION OF TIME**

Verizon Florida Inc. (Verizon) and DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) hereby jointly move this Commission for an extension of time to file an interconnection agreement in this arbitration proceeding until August 2, 2006.

With respect to the vast majority of the Commission's determinations in this docket, Verizon and Covad were able to draft agreed-upon language consistent with the Commission's final order on arbitration (PSC-03-1139-FOF-TP) issued October 13, 2003. Nonetheless, the parties were not able to reach agreement on how to address the changes from the FCC's Triennial Review Order (TRO) in the interconnection agreement. Accordingly, in Order No. PSC-06-0135-PCO-TP, the Commission extended the time for filing a signed conforming amendment to 90 days following the issuance of its order approving the agreement amendments in Docket No. 040156-TP. Since then, on March 15, 2006, the Commission issued Order No. PSC-06-0212-FOF-TP in Docket No. 040156-TP specifying language to be used in the parties' amendments; on March 17, Verizon filed an executed amendment with Covad pursuant to the March 15 Order; and on May 4, Staff administratively approved that amendment.

To allow the parties sufficient time to review both the previously agreed-upon language and to incorporate the rulings of the Commission in Docket No. 040156-TP into their conforming agreement, Verizon and Covad respectfully request that the Commission extend the time for filing a conforming agreement to August 2, 2006. Because both parties join in this request, no party will be prejudiced by this extension.

WHEREFORE, for the foregoing reasons, Verizon and Covad respectfully request that this Commission extend the time for filing an executed, conforming amendment to August 2, 2006.

Respectfully submitted on June 13, 2006.

s/ Dulaney L. O'Roark III  
Dulaney L. O'Roark III  
Verizon Legal Department  
6 Concourse Parkway, Ste. 600  
Atlanta, Georgia 30328  
Phone: (770) 284-5498  
Fax: (770) 284-5488  
Email: [de.oroark@verizon.com](mailto:de.oroark@verizon.com)

Attorney for Verizon Florida Inc.

s/ Vicki Gordon Kaufman  
Vicki Gordon Kaufman  
Moyle, Flanigan, Katz, Raymond & Sheehan, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
Phone: 850-681-3828

Charles E. Watkins  
Covad Communications Company  
1230 Peachtree Street, N.E., Suite 1900  
Atlanta, GA 30309  
Phone: 678-528-6816

Attorneys for DIECA Communications, Inc. d/b/a  
Covad Communications Company