Woods, Vickie [vf1979@att.com]

ORIGINAL

Timolyn Henry

From:

Sent:		Monday, May 21, 2007 4:00 PM		
То:		Filings@psc.state.fl.us		
Subject:		050257-TP Joint Motion for Third Extension of Filing Dates		
Importance:		High		
A	ttachments	050257-T.pdf		
Α.	Vickie Woods		CNP an accompanies	
BellSouth 150 South Suite 400 Tallahass (305) 347		retary to James Meza III and Manuel A. Gurdian Telecommunications, Inc.	CONTRACTOR	
		Monroe Street	And the state of t	
			Can	
		e, Florida 32301		
		ds2@bellsouth.com		
	VICKIE.WOO	asz <u>@bensouth.com</u>	Commence and the commen	
В.	Docket No. 050257-TP		PCA MAINTEN TOTAL MAINT	
O List by DallOauth Talacaramy migations. Inc. Departing the Operation of a			The second secon	
Complaint by BellSouth Telecommunications, Inc., Regarding the Operation of a Telecommunications Company by Miami-Dade County in Violation of Florida Statutes and Commission Rules		tions Company by Miami-Dade County in Violation of Florida Statutes	COA	
		n Rules	Company of the Compan	
C.		Telecommunications, Inc. d/b/a AT&T Florida of Manuel A. Gurdian	OTH Kim	
D.	5 pages to	otal (includes letter, pleading and certificate of service)		
E.	BellSouth	BellSouth Telecommunications, Inc. d/b/a ("AT&T Florida"), Miami-Dade County (the "County") and the Greater Orla		
	Aviation Authority ("GOAA")'s Joint Motion for Third Extension of Filing Dates			
	.pdf			
<<0)50257-T.pdf	;>>		
***	: * *			
pro relia	prietary, and ance upon th	transmitted is intended only for the person or entity to which it is addressed a /or privileged material. Any review, retransmission, dissemination or other use is information by persons or entities other than the intended recipient is prohib he sender and delete the material from all computers. GA622	of, or taking of any action in	



Legal Department

MANUEL A. GURDIAN

Attorney

AT&T Florida 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (305) 347-5561

May 21, 2007

Ms. Ann Cole Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 050257-TL: Complaint by BellSouth

Telecommunications, Inc., Regarding the Operation of a Telecommunications Company by Miami-Dade County in Violation of

Florida Statutes and Commission Rules

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Joint Motion for Third Extension of Filing Dates, which we ask that you file in the captioned docket.

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

Sincerely.

Manuel A. Gurdian

cc: All Parties of Record Jerry D. Hendrix E. Earl Edenfield, Jr. James Meza III

CERTIFICATE OF SERVICE Docket No. 050257-TL

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

Electronic Mail and First Class U. S. Mail this 21st day of May, 2007 to the following:

Adam Teitzman
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us

Murray A. Greenberg Miami-Dade County Attorney David Stephen Hope, Esq. Cvnii Lee. Esa. **Assistant County Attorneys** Miami-Dade County Attorney's Office Aviation Division U.S. Mail Address P.O. Box 592075 AMF Miami, Florida 33159-2075 Miami International Airport **Terminal Building** Concourse A, 4th Floor Miami, FL 33122 Tel. No. (305) 876-7040 Fax No. (305) 876-7294 dhope@miami-airport.com dhope@miamidade.gov

Jean L. Kiddoo
Danielle C. Burt
Bingham McCutchen
2020 K Street, N.W.
Washington, D.C. 20006-1806
Tel. No. (202) 373-6034
Fax. No. (202) 424-7645
ilkiddoo@bingham.com
dcburt@bingham.com

M. Stephen Turner, P.A.
David K. Miller, P.A.
Broad and Cassel
215 South Monroe Street
Suite 400
Tallahassee, FL 32302
Tel. No. (850) 681-6810
Fax. No. (850) 521-1448
sturner@broadandcassel.com
dmiller@broadandcassel.com

Douglas Startcher, Esq.
Broad and Cassel
390 North Orange Avenue
Suite 1100
Orlando, FL 32801-4961
Tel. No. (407) 839-4208
Fax. No. (407) 650-0943
dstarcher@broadandcassel.com

Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth

Telecommunications, Inc. Regarding
The Operation of a Telecommunications)
Company by Miami-Dade County in
Violation of Florida Statutes and
Commission Rules

Docket No.: 050257-TL

JOINT MOTION FOR THIRD EXTENSION OF FILING DATES

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), Miami-Dade County (the "County"), and the Greater Orlando Aviation Authority ("GOAA") (collectively, the "Parties"), by and through their undersigned counsel hereby file this Joint Motion for third Extension of Filing Dates in the above styled matter, Docket No. 050257-TL, and in support of their Motion state:

- 1. Pursuant to the Order Granting Proposed Joint Procedural Schedule, Order No. PSC-06-0326-PCO-TL, issued April 21, 2006, and the Parties Joint Second Motion for Extension of Filing Dates filed March 15, 2007, direct briefs are currently to be filed by the Parties on or before May 25, 2007, and reply briefs on or before June 11, 2007. The Parties hereby request an additional extension of forty-five (45) days, which would make direct briefs due on July 9, 2007, and reply briefs due on July 24, 2007.
- 2. Said extension will allow AT&T Florida and the County to continue to discuss settlement alternatives. In addition, the extension will permit the Parties additional time to compile a complete set of the voluminous exhibits for use by the Parties in preparing their briefs and by the Commission in its review.

WHEREFORE, BellSouth Telecommunications, Inc. d/b/a AT&T Florida, Miami-Dade County, and the Greater Orlando Aviation Authority respectfully request this Commission grant the Parties an additional forty-five (45) day extension of the filing dates in this matter so that initial briefs are due on July 9, 2007 and reply briefs are due on July 24, 2007.

DATED: May 21, 2007

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

d/b/a AT&T Florida

Martin B. Goldberg, Esq. LASH & GOLDBERG LLP

Bank of America Tower, Suite 1200

100 Southeast Second Street

Miami, Florida 33131

Tel. No. (305) 347-4040

Fax No. (305) 347-4050

mgoldberg@lashgoldberg.com

MIAMI-DADE)COUNTY

MURRAY A. GREENBERG

Miami-Dade County Attorney

David Stephen Hope, Esq.

Assistant County Attorney

Miami-Dade County Attorney's Office

111 Northwest First Street, Suite 2800

Miami, Florida 33128-1993

Tel. No. (305) 375-5151

Fax No. (305) 375-5611

dhope@miamidade.gov

dhope@miami-airport.com

In re: Complaint by BellSouth Telecommunications, Inc. Docket No. 050257-TL

GREATER ORDANDO AVIATION AUTHORITY

Jean L. Kiddoo, Esq.
Danielle C. Burt, Esq.
Bingham McCutchen LLP
2020 K. Street, N.W.
Washington, DC, 20006-1806
Tel. No. (202) 373-6034
Fax No. (202) 424-7645
Jean.Kiddoo@bingham.com
Danielle.Burt@bingham.com

Douglas Starcher, Esq. Broad and Cassel 390 North Orange Avenue Suite 1100 Orlando, FL 32801-4961 Tel. No. (407) 839-4208 Fax No. (407) 650-0943 dstarcher@broadandcassel.com