



AT&T Florida 150 South Monroe Street Suite 400 Tallahassee, FL 32301 T: (850) 577-5508 th9467@att.com

January 29, 2015

Carlotta Stauffer, Commission Clerk Office of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: <u>Docket No.: 140156-TP</u>: Petition of Communications Authority, Inc. for Section 252(b) Arbitration

Dear Ms. Stauffer:

Enclosed is BellSouth Telecommunications, LLC d/b/a AT&T Florida's Unopposed Motion for Extension of Time, which we ask that you file in the captioned docket.

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

Sincerely,

s/Tracy W. Hatch

Tracy W. Hatch

cc: All Parties of Record Elise R. McCabe Brian W. Moore

1123954



## CERTIFICATE OF SERVICE Docket No. 140156-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 29<sup>th</sup> day of January, 2015, to the following:

Lee Eng Tan
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No.: (850) 413-6183
ltan@psc.state.fl.us

Communications Authority Mike Ray 11523 Palm Brush Trail, #401 Lakewood Ranch, FL 34202 Tel. No.: (941) 600-0207 mike@commauthority.com

Twomey Law Firm Kristopher E. Twomey 1725 I Street, NW, Suite 300 Washington, DC 20006 Tel. No.: (202) 681-1850 Fax No.: (202) 517-9175

kris@lokt.net

s/Tracy W. Hatch
Tracy W. Hatch

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for Arbitration of Interconnection	)	Docket 140156-TP
Agreement Between BellSouth Telecommunications,	)	
LLC d/b/a AT&T Florida and Communications	)	Filed: January 29, 2015
Authority, Inc.	)	

## AT&T FLORIDA'S UNOPPOSED MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 28.106-204, Florida Administrative Code, hereby files this Motion for Extension of Time to serves its Responses to the Staff of the Florida Public Service Commission's First Set of Interrogatories and First Request for Production of Documents. In support, AT&T Florida states:

- 1. The Staff of the Florida Public Service Commission served its First Set of Interrogatories on January 9, 2015, consisting of 76 Interrogatories and 2 Requests for Production of Documents.
- 2. Order No. PSC-14-0700-PCO-TP governs the procedural requirements in the instant proceeding, requiring that responses to discovery requests be served within 20 days from the date of service.
- 3. AT&T Florida has worked diligently, but it has determined that it needs an additional amount of time to complete the discovery requests. Accordingly, AT&T Florida requests the Prehearing Office extend the time for filing the responses until Monday February 2, 2015.
  - 4. No party will be prejudiced by the requested extension.
- 5. Pursuant to Rule 28.106-204, AT&T Florida has consulted with the parties and is authorized to state that no one has any objection.

WHEREFORE, for the foregoing reasons, AT&T Florida requests that the Prehearing Officer extend the time for serving the responses to Staff's First Set of Interrogatories and First Request for Production until February 2, 2015.

Respectfully submitted this 29th day of January, 2015.

By: s/Tracy W. Hatch
Brian W. Moore
Authorized House Counsel No.
Tracy W. Hatch
Florida Bar No. 449441
c/o Elise R. McCabe
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558
bm1694@att.com
th9467@att.com

Attorneys for AT&T Florida