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February 25, 2002

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


Re: Docket No. 001097-TP (Supra Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion to Extend The Due Date For Filing Rebuttal Testimony, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


E. Earl Edenfield, Jr. (EA)

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

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

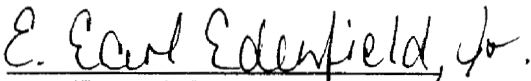
CERTIFICATE OF SERVICE
Docket No. 001097-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Facsimile and U.S. Mail this 25th day of February, 2002 to the following:

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E. Earl Edenfield Jr. (LA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of BellSouth)	
Telecommunications, Inc. against Supra)	Docket No. 001097-TP
Telecommunications and Information)	
Systems, Inc., for Resolution of Billing)	
Disputes.)	
<hr/>		Filed: February 25, 2002

**BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION TO EXTEND THE
DUE DATE FOR FILING REBUTTAL TESTIMONY**

BellSouth Telecommunications, Inc., ("BellSouth") files this Motion to Extend the Due Date for Filing Rebuttal Testimony, and says:

1. Pursuant to the Commission's Order Setting Matter for Rehearing and Establishing Procedure (Order No. PSC-02-0143-PCO-TP) dated January 31, 2002, rebuttal testimony from the parties is due March 1, 2002.

2. *Florida Administrative Code* § 28-106.204(5) provides that "Motions for extension of time shall be filed prior to the expiration of the deadline sought to be extended and shall state good cause for the request." This Motion is timely filed and good cause for the Motion is set forth below.

3. On February 13, 2002, Supra Telecommunications & Information Systems, Inc. ("Supra") filed a Motion to Dismiss for Lack of Subject Matter Jurisdiction, which was premised on an argument that a recent decision by the Eleventh Circuit Court of Appeals¹ divested the Florida Public Service Commission ("Commission") of subject matter jurisdiction over this proceeding. BellSouth requested

¹ See, *BellSouth Telecommunications, Inc. v. MCI Metro Access Transmission Services, Inc.* (00-12809) and *BellSouth Telecommunications, Inc. v. Worldcom Technologies, Inc.* (00-12810).

an extension of time until February 27, 2002 in which to respond to Supra's Motion to Dismiss.

4. On February 22, 2002, BellSouth filed a Motion to Strike portions of the direct testimony of the Supra witnesses. Supra's response to BellSouth's Motion is not due until March 1, 2002.

5. Supra's Motion to Dismiss and BellSouth's Motion to Strike will directly impact the rebuttal testimony that is due to be filed on March 1, 2002. Thus, BellSouth seeks an extension of the rebuttal testimony due date so as to give the Commission time to consider and rule on the pending motions. Without Commission guidance on the relevance of certain portions of Supra's direct testimony, BellSouth anticipates that BellSouth will have to file (and the Commission ultimately consider) a similar Motion to Strike directed to Supra's rebuttal testimony.

6. BellSouth does not want to jeopardize the date of the Prehearing Conference (March 14, 2002) or the date of the hearing (April 4, 2002). At the same time, BellSouth wants to give the Commission adequate time to consider all pending Motions impacting the rebuttal testimony. Therefore, BellSouth requests that the rebuttal testimony due date be extended to Tuesday, March 12, 2002.

7. Neither party will be prejudiced by the Commission extending the due date for rebuttal testimony because: (1) the due date extension will apply to both parties; and (2) the due date extension will not affect any other date in the current procedural schedule.

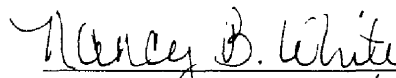
8. BellSouth contacted Supra to determine whether Supra objects to this request for extension of the due date for filing rebuttal testimony. Supra indicated that it objects to the extension of time.

9. Based on the foregoing, BellSouth has satisfied the requirements of *Florida Administrative Code* § 28-106.204(5) and requests that the due date for filing rebuttal testimony be extended to Tuesday, March 12, 2002.

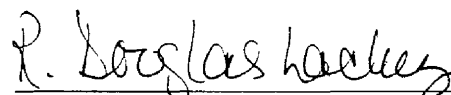
WHEREFORE, BellSouth respectfully requests that the Commission grant BellSouth's Motion to Extend the Due Date for Filing Rebuttal Testimony.

Respectfully submitted this 25th day of February 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



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