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# Southern Bell

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May 1, 1992

**ORIGINAL  
FILE COPY**

Mr. Steve C. Tribble  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: Docket No. 911185-TL - Volusia County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Second Extension of Time, 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.

ACK

ASA \_\_\_\_\_

APP \_\_\_\_\_

CAF \_\_\_\_\_

SAI \_\_\_\_\_

CTR \_\_\_\_\_ Enclosures

EAD \_\_\_\_\_ cc: All Parties of Record

LE 14/12 \_\_\_\_\_ A. M. Lombardo

LE 6 \_\_\_\_\_ Harris R. Anthony

LE \_\_\_\_\_ R. Douglas Lackey

CTD \_\_\_\_\_

ROH \_\_\_\_\_

SEC  RECEIVED & FILED

WAS \_\_\_\_\_ 14 \_\_\_\_\_

OTH \_\_\_\_\_

Sincerely yours,

*J. Phillip Carver*  
J. Phillip Carver

DOCUMENT NUMBER-DATE

04320 MAY-1 1992

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 911185-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this *1<sup>st</sup>* day of *May*, 1992

to:

Angela Green  
Division of Legal Services  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

Alan N. Berg  
Senior Attorney  
United Telephone Co. of Florida  
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Volusia County Council  
c/o County Manager  
123 W. Indiana Avenue  
Deland, FL 32720-4612

*J. Phillip Carver*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Extended Area ) Docket No. 911185-TL  
Service between all exchanges within )  
Volusia County by Volusia County ) Filed: April 29, 1992  
Council )  
\_\_\_\_\_ )

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR SECOND EXTENSION OF TIME

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.037, Florida Administrative Code, hereby moves the Florida Public Service Commission ("the Commission") for an additional thirty-day extension of time in which to respond to Order No. 25675 in the above-referenced docket, and as grounds therefore states:

1. On February 3, 1992, the Commission issued Order No. 25675 requiring Southern Bell to file traffic studies. The Order requires that Southern Bell extract data for fifty-nine (59) routes. Because of the large number of routes involved, the data processing is significantly more complicated than for traffic studies of more limited scope. Therefore, Southern Bell moved for a thirty-day extension, until May 4, 1992, to respond to Order No. 25675. This extension was granted on March 23, 1992, by Order No. PSC-92-0085-PCO-TL.

2. Subsequent to the granting of the extension described above, systematic difficulties have arisen that will cause a further unanticipated delay in the filing of these traffic studies. Specifically, in October of 1991, Southern Bell's Data Processing Center in Jacksonville, Florida, (at which the traffic

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studies in question would have been run) was consolidated with several other processing centers to form a Regional Data Center in Miami, Florida. This consolidation, which will result in long term efficiencies for Southern Bell and its ratepayers, involved changes in both the personnel responsible for processing the pertinent data as well as systematic changes in the manner in which these data are processed.

3. In April of this year, Southern Bell undertook the first traffic studies to be processed at this new Regional Center. The first two traffic studies, which were processed in the month of April as ordered in Docket Nos. 911186-TL and 911184-TL, required substantially longer to complete than usual because of the changes in personnel and procedure attendant to the consolidation of data centers. The complexity of the studies required in this docket, combined with the factors set forth above, have caused even greater delay in the processing of the necessary data to complete the instant studies. Southern Bell anticipates that the delays that have occurred in April represent only short term problems that have been resolved.

4. The traffic studies in question may be completed in as little as one additional week. In an abundance of caution, however, and to ensure that no further extension will be needed, Southern Bell has herein requested an extension of thirty days. If, in fact, this entire thirty-day period is not needed to complete the traffic studies, then Southern Bell will file the

studies at the earliest time within the thirty-day period at which complete and accurate studies can be finalized.

5. The requested extension will not prejudice any party to this proceeding and will facilitate a reasoned, informed decision by this Commission. It is also anticipated that the problems that gave rise to the need for this extension will not recur.

WHEREFORE, Southern Bell Telephone and Telegraph Company respectfully requests that the Commission grant it an additional thirty-day extension, until June 4, 1992, in which to respond to Order No. 25675.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND  
TELEGRAPH COMPANY



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