BEFORE THE FLORIDA PUBLIC SERVICECOMMISSION

In re: Investigation into pricing)	Docket No. 990649-TP 3		- Á
of unbundled network elements)	Filed: May 17, 2000 卍台	HAY	$ \frac{\circ}{\Box}$
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MOTION FOR EXTENSION OF TIME FOR FILING TESTIMONY

AT&T Communications of the Southern States, Inc. ("AT&T"), MCI WorldCom, Inc. ("MCI WorldCom"), and the Florida Competitive Carriers Association ("FCCA"). (collectively "Movants"), by and through their undersigned attorneys, hereby state as follows:

- The procedural schedule in this docket requires ALECs to file testimony 1. on June 1, 2000, and requires the ILECs to file rebuttal testimony on June 22, 2000. (Order No. PSC-00-0540-PCO-TP, issued March 16, 2000). Movants respectfully request that these dates be moved to June 15 and June 29 respectively. The hearing should begin on July 17, 2000, as currently scheduled.
- 2. This extension is requested due to the complexity of the issues, and the complications related to evaluating BellSouth's completely new cost model. A full understanding of BellSouth's new model is essential to the Movants' ability to participate meaningfully in this significant docket. Unfortunately, the Movants' witnesses have had difficulties in accessing, much less manipulating, the model, and this has had a significant impact on their ability to prepare testimony.
- 3. On May 15, 2000, BellSouth participated in a Staff-noticed workshop to inform the parties how to use the model, and also responded to specific, detailed questions from parties. During the workshop, BellSouth committed that the ALECs'

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experts could contact BellSouth's experts, who would respond to questions on how the model works. The Movants hope that the information gathered from the workshop and the continued discussion among the parties' experts, coupled with the requested extension, will be sufficient to enable the ALEC witnesses to prepare their testimony by June 15, 2000. Without adequate time in which to properly analyze BellSouth's vast new cost model, Movants will be prejudiced in their ability to prepare testimony and will not be able to present the Commission the information it needs to make an informed decision in this docket.

3. BellSouth and Sprint have agreed to this extension. The Movants understand that GTE would oppose an extension longer than one week.

WHEREFORE, for the above-stated reasons, the Movants respectfully request that the Commission grant an extension of time for the filing of ALEC testimony to June 15 and the filing of ILEC rebuttal testimony to June 29 respectively.

DATED this 17 day of May, 2000.

Respectfully submitted,

Pier O. Pas

Richard D. Melson Hopping Green Sams & Smith, P.A. P.O. Box 6526 Tallahassee, FL 32314 (850) 425-2313

Donna Canzano McNulty MCI WorldCom, Inc. 325 John Knox Road, Ste. 105 Tallahassee, FL 32303 (850) 422-1254

Attorneys for MCI WorldCom, Inc.

Marska Rule / Rom

Marsha Rule AT&T Communications of the Southern States, Inc. 101 North Monroe Street, Suite 700 Tallahassee, FL 32301 (850) 425-6365

Attorney for AT&T Communications of the Southern States, Inc.

Joseph A. McGlothlin

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A.

117 South Gadsden Street Tallahassee, FL 32301

(850) 222-2525

Attorneys for Florida Competitive Carriers Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail this 17th day of May, 2000.

Beth Keating (by hand)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard oak Blvd.
Tallahassee, FL 32399-0850

BellSouth Telecommunications, Inc. Nancy B. White (by for) c/o Nancy H. Sims 150 S. Monroe Street, Suite 400 Tallahassee, FL 32301-1556

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold, & Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301

Andrew O. Isar Telecommunications Resellers Association 4312 92nd Avenue, N.W. Gig Harbor, WA 98335

Floyd Self/Norman H. Horton, Jr. Messer, Caparello & Self P.O. Drawer 1876 215 S. Monroie Street Suite 701 Tallahassee, FL 32302-1876

Florida Public Telecom Assoc. Angela Green, General Counsel 125 S. Gadsden Street # 200 Tallahassee, FL 32301-1525 Tracy Hatch
AT&T Communications
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301

Susan Huther Rick Heapter MGC Communications, Inc. 3301 Worth Buffalo Drive Las Vegas, Nevada 89129

James C. Falvey, Esq. e.spire Communications, Inc 133 National Business Parkway Suite 200 Annapolis Junction, Maryland 20701

Jeremy Marcus Kristen Smith Blumenfeld & Cohen 1625 Massachusetts Ave. NW Suite 300 Washington, D.C. 20036

Terry Monroe Vice President, State Affairs Competitive Telecomm. Assoc. 1900 M. Street, N.W. Suite 800 Washington, DC 20036

Kimberly Caswell (by fox)
GTE Service Corporation
One Tampa City Center
201 North Franklin Street
Tampa, FL 33601-0110

Carolyn Marek
Vice President of Regulatory
Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Mark Buechele Supra Telecommunications & Information Systems, Inc. 2620 SW 27th Avenue Miami, FL 33133

Donna Canzano McNulty, Esq. MCI WorldCom 325 John Knox Road Suite 105 Tallahassee, Fl 32303

Michael A. Gross VP Reg. Affairs & Reg. Counsel Florida Cable Telecomm. Assoc. 310 North Monroe Street Tallahassee, FL 32301

TCG South Florida c/o Rutledge Law Firm Kenneth Hoffman P.O. Box 551 Tallahassee, FL 32302-0551

Peter M. Dunbar, Esq.
Marc W. Dunbar Esq.
Pennington, Moore, Wilkinson &
Dunbar
P.O. Box 10095
Tallahassee, FL 32302

Scott A. Sapperstein Sr. Policy Counsel Intermedia Communications 3625 Queen Palm Dr. Tampa, FL 33619

Eric J. Branfman
Morton J. Posner
Swidler Berlin Shereff
Friedman, LLP
3000 K Street, NW, Suite 300
Washington, D.C. 20007-5116

Christopher V. Goodpastor, Esq. Covad Communications, Co. 9600 Great Hills Trail Suite 150W Austin TX, 78759

Charles J. Rehwinkel Sprint P.O. Box 2214 Tallahassee, FL 32316

Bettye Willis ALLTEL Communications Services, Inc. One Allied Drive Little Rock, AR 72203-2177

J. Jeffry Wahlen Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302

Florida Competitive Carriers Association P.O. Box 10967 Tallahassee, FL 32302

Florida Digital Network, Inc. 390 N. Orange Ave., Suite 2000 Orlando, FL 32801

KMC Telecom, Inc. John McLaughlin Suite 170 3025 Breckinridge Blvd. Duluth, Ga 30096

MCI WorldCom, Inc. Mr. Brian Sulmonetti Concourse Corporate Center Six Six Concourse Parkway, Suite 3200 Atlanta, GA 30328

NorthPoint Communications, Inc. Glenn Harris, Esq. 22 Sutter Street, 7th Floor San Francisco, CA 94108 Office of Public Counsel Stephen C. Reilly c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400

Holland Law Firm Bruce May P.O. Drawer 810 Tallahassee, FL 32302

John Fons (by fax)
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302

Pie D. Mu

Attorney