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February 10, 2006 – **VIA ELECTRONIC MAIL**

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

Re: Docket No. 020960-TP  
Petition for Arbitration of open issues resulting from interconnection negotiations  
with Verizon Florida Inc. by DIECA Communications, Inc. d/b/a Covad  
Communications Company

Dear Ms. Bayo:

Enclosed for filing in the above matter is a Joint Motion for Extension of Time on behalf  
of Verizon Florida Inc. and DIECA Communications, Inc. d/b/a Covad Communications  
Company. Service has been made as indicated on the Certificate of Service. If there  
are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

s/ Leigh A. Hyer

Leigh A. Hyer

LAH:tas  
Enclosures

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Joint Motion for Extension of Time in Docket No. 020960-TP were sent via U.S. mail on February 10, 2006 to

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Florida Public Service Commission  
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s/Leigh A. Hyer

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Arbitration of open issues	)	Docket No. 020960-TP
resulting from interconnection negotiations	)	Filed: February 10, 2006
with Verizon Florida Inc. by DIECA	)	
Communications, Inc. d/b/a Covad	)	
Communications Company	)	
_____	)	

**JOINT MOTION FOR EXTENSION OF TIME**

Verizon Florida Inc. (Verizon) and DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) hereby jointly move this Commission for an extension of time to file an interconnection agreement in this arbitration proceeding until ninety (90) days following the issuance of its order approving a final interconnection amendment in Docket No. 040156-TP.

With respect to the vast majority of the Commission’s determinations in this docket, Verizon and Covad were able to draft agreed-upon language consistent with the Commission’s final order on arbitration (PSC-03-1139-FOF-TP) issued October 13, 2003. Nonetheless, the parties were not able to reach agreement on how to address the changes from the FCC’s Triennial Review Order (“TRO”) in the interconnection agreement.

The terms and conditions for amendments to interconnection agreements to incorporate the FCC’s rules in the TRO are currently being addressed by the Commission in Docket No. 040156-TP. Verizon and Covad agree that final approval of the specific terms of the amendments in Docket No. 040156-TP is necessary for the parties to finalize their conforming interconnection agreement in a manner consistent with that docket. In Order No. PSC-04-0396-PCO-TP issued on April 14, 2004, the

Commission granted the parties' joint motion for extension of time to file the interconnection agreement until thirty (30) days following the issuance of the Commission's final order in Docket No. 040156-TP. The Commission has not yet approved the final language in that docket, and as a result, this arbitration proceeding has been inactive for almost two years.

Therefore, to allow the parties sufficient time to review both the previously agreed-upon language and to incorporate the rulings of the Commission in Docket No. 040156-TP into their conforming agreement, Verizon and Covad respectfully request that the Commission extend the time for filing a conforming agreement to ninety (90) days after issuance of its order approving the final interconnection agreement amendment terms in Docket No. 040156-TP.

As both parties join in this request, no party will be prejudiced by this extension.

WHEREFORE, for the foregoing reasons, Verizon and Covad respectfully request that this Commission extend the time for filing an executed, conforming amendment to ninety (90) days following the issuance of its order approving a final interconnection amendment in Docket No. 040156-TP.

Respectfully submitted on February 10, 2006.

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