JAMES MEZA III Senior Regulatory Counsel

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March 10, 2006

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. 041269-TP

In re: Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting From Changes of Law

Dear Ms. Bayo:

Enclosed is a Joint Motion for Extension of Time to file the executed Interconnection Agreements, which we ask that you file in the captioned docket.

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

Sincerely,

James Meya III (BM)

cc: All Parties of Record Jerry D. Hendrix R. Douglas Lackey Nancy B. White

# CERTIFICATE OF SERVICE Docket No. 041269-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U. S. Mail this 10th day of March, 2006 to the

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(+) signed Protective Agreement

(\*) via FedEx

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:	)	
	)	Docket No. 041269-TL
Petition to Establish Generic Docket to	)	
Consider Amendments to Interconnection	)	
Agreements Resulting From Changes of Law	)	Filed: March 10, 2006
	)	

## JOINT MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"), NewSouth Communications Corp., NuVox Communications Corp., and Xspedius Communications, LLC (collectively referred to as "Joint Petitioners") jointly ask the Florida Public Service Commission ("Commission") for an extension of time in which to execute and file executed interconnection agreements. In support of this Joint Motion, the parties state the following:

1. Pursuant to Order No. PSC-06-0172-FOF-TP, the parties are required to file executed amendments to the parties' current interconnection agreements or new interconnection agreements on March 10, 2006. However, because the parties have arbitrated and will shortly execute new interconnection agreements to reflect, as to unresolved issues, the Commission's decision in Docket No. 040130-TP ("Arbitration Docket") and the instant docket, and because the parties need additional time to negotiate and incorporate the Commission's decisions as to their unresolved issues, the parties request that they be allowed to file the new agreements on March 31, 2006. The new agreements will incorporate with respect to previously unresolved issues the Commission's decision in the Arbitration Docket and this docket. Thus, by filing the new executed interconnections agreement on March 31,

<sup>&</sup>lt;sup>1</sup> Pursuant to Order No. 05-1247-PCO-TP, the parties are required to file the new interconnection agreement within 30 days of the Commission's issuance of its order in Docket No. 041269-TP.

2006, there would not be a need to file amendments to the existing interconnection agreements.

- 2. Consistent with Order No. PSC-06-0172-FOF-TP, the parties have also agreed that the new agreements will be effective as of March 11, 2006. Thus, this request for a brief extension of time will not materially alter the Commission's filing requirements in Order No. PSC-06-0172-FOF-TP.
- 3. Further, because the Joint Petitioners and BellSouth are both seeking this extension, no party will be prejudiced by this request for an extension. In addition, because the effective date of the new interconnection agreements will be March 11, 2006, the new agreements will have the same effective date as would amendments to the existing interconnection agreements.
- 4. By filing this Motion, none of the parties waive any arguments or rights they may have regarding application or the effectiveness of Order No. PSC-06-0172-FOF-TP on any party.

WHEREFORE, for the foregoing reasons, BellSouth and the Joint Petitioners respectfully request that this Commission grant them an extension until March 31, 2006 to file new interconnection agreements memorializing and incorporating the Commission's decision in the instant docket with respect to previously unresolved issues and the Arbitration Docket.

Respectfully submitted, this 10th day of March, 2006.

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