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May 2, 2007

Ms. Ann Cole, Director  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Room 110  
Tallahassee, Florida 32399-0850

RE: Docket No. 070249-TP  
In the matter of Petition of Sprint Communications Company Limited Partnership and Sprint Spectrum Limited Partnership d/b/a Sprint PCS for arbitration of rates, terms and conditions of interconnection with BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast

Dear Ms. Cole:

Attached to this electronic filing please find the following documents for filing on behalf of Sprint Communications Company Limited Partnership and Sprint Spectrum Limited Partnership d/b/a Sprint PCS in the above-referenced docket:

Sprint's Motion for Extension of Time to Respond to AT&T Florida's Motion to Dismiss

Parties of record will be served via email and U.S. Mail as set forth in the Certificate of Service attached to the Motion. As always, thank you for your assistance with this filing and please do not hesitate to contact me if you have any questions.

Sincerely,



Marsha E. Rule

MER/tc  
Cc: Parties of record

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In the matter of Petition of Sprint Communications Company Limited Partnership and Sprint Spectrum Limited Partnership d/b/a Sprint PCS for arbitration of rates, terms and conditions of interconnection with BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast

Docket No. 070249-TP

Filed: May 2, 2007

**SPRINT'S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO AT&T FLORIDA'S MOTION TO DISMISS**

Sprint Communications Company Limited Partnership and Sprint Spectrum Limited Partnership d/b/a Sprint PCS (collectively referred to as "Sprint"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby files this Motion for Extension of Time to Respond to AT&T Florida's Motion to Dismiss. In support, Sprint states as follows:

1. On April 6, 2007, Sprint filed its Petition for Arbitration in this docket, seeking arbitration of certain terms and conditions of interconnection with BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast ("AT&T"). Sprint's Arbitration Petition raises a single legal issue regarding AT&T's denial of Sprint's request to extend its current Interconnection Agreement pursuant to certain commitments made by AT&T, Inc. and BellSouth Corporation in connection with their 2006 merger. On May 1, 2007, AT&T filed its Motion to Dismiss and Answer to Sprint's Petition.

2. In its Motion to Dismiss, AT&T argues that Sprint's request for an extension of the terms and conditions of its current Interconnection Agreement is not a proper subject of arbitration by the Commission, and that the FCC has sole jurisdiction over AT&T's merger commitments. AT&T's argument that the Commission lacks jurisdiction over the arbitration sought by Sprint presents an issue of first impression for this Commission.

3. Pursuant to Rule 28-106.204, Florida Administrative Code, Sprint's response in opposition to AT&T's Motion is due on May 8, 2007. Given the unique issues presented by AT&T's Motion to Dismiss, Sprint requests a brief extension of time up to and including May 15, 2007, in which to respond to AT&T's Motion. This motion is made in good faith, and the short extension requested by Sprint will not unduly delay this proceeding or prejudice the rights of the parties.

4. Pursuant to Rule 28-106.204, Florida Administrative Code, counsel for Sprint conferred with counsel for AT&T to determine AT&T's position regarding this request. To date AT&T has not advised the undersigned of its position.

**WHEREFORE**, Sprint requests the Commission to grant an extension of time up to and including May 15, 2007, for the filing of Sprint's Response in Opposition to AT&T's Motion to Dismiss.

Respectfully submitted,



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ATTORNEYS FOR SPRINT  
COMMUNICATIONS COMPANY LIMITED  
PARTNERSHIP AND SPRINT SPECTRUM  
LIMITED PARTNERSHIP


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion has been furnished by U.S. Mail and email to the following parties on this 2<sup>nd</sup> day of May, 2007:

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