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REPORTING
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April 17, 2001

HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

Re: Docket No. 001810-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of TCG South Florida and Teleport Communications Group ("TCG") are the original and fifteen copies of a Motion for Extension of Time to File Direct Testimony.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Martin P. McDonnell
Martin P. McDonnell

- APP _____
- CAF _____
- CMP _____
- COM 3 _____
- CTR _____ MPM/rl
- ECR _____
- LEG 1 Enclosures
- OPC _____ cc: All Parties of Record
- PAI _____
- RGO _____
- SEC 1 _____
- SER _____
- OTH _____

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DOCUMENT NUMBER-DATE
04700 APR 17 2001
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of TCG South Florida and)
Teleport Communications Group for)
Enforcement of Interconnection Agreement)
with BellSouth Telecommunications, Inc.)

Docket No. 001810-TP

Filed: April 17, 2001

**MOTION FOR EXTENSION OF TIME
TO FILE DIRECT TESTIMONY**

TCG South Florida and Teleport Communications Group (hereinafter referred to collectively as "TCG"), by and through undersigned counsel, respectfully moves the Commission for a one week extension of time to file direct testimony in the above docket, and as grounds therefor states:

1. Pursuant to Order No. PSC-01-0833-PCO-TP issued March 30, 2001, the direct testimony and exhibits are due to be filed in the instant docket on or before April 19, 2001.

2. Despite diligent effort, TCG will be unable to complete direct testimony by April 19, 2001 due to the resignation of Greg Follensbee, the former Director of Law and Government Affairs for AT&T's Southern Region.

3. Prior to his resignation, Mr. Follensbee was the witness designated by TCG to file direct testimony in the above docket, as AT&T acquired TCG in 1998.

4. Mr. Follensbee's departure requires TCG to file direct testimony in the instant docket through a witness other than Mr. Follensbee.

5. TCG is currently in the process of preparing direct testimony through another witness and respectfully requests a one week extension of time to complete that direct testimony. In conjunction therewith, TCG respectfully requests that the previously ordered dates for filing rebuttal testimony be extended from May 16, 2001, to May 18, 2001, and the previously ordered dates for filing prehearing statements be extended from May 21, 2001, to May 23, 2001.

DOCUMENT NUMBER-DATE

04700 APR 17 2001

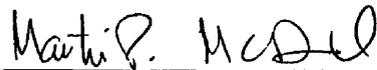
FPSC-RECORDS/REPORTING

6. Undersigned counsel has contacted James Meza, counsel for BellSouth in the instant docket, who has no objection to the granting of a one week extension to allow TCG to complete direct testimony in the above cause.

7. In the interest of fairness, TCG has no objection to the granting of an equivalent extension of all above time periods to BellSouth as well as TCG.

WHEREFORE, TCG respectfully requests that this Commission grant a one week extension for the filing of direct testimony and grant all other attendant relief requested herein.

Respectfully submitted,



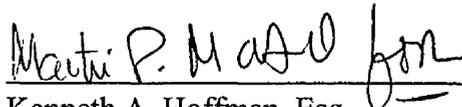
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail this 17th day of April, 2001 to the following:

Nancy B. White, Esq.
James Meza, III, Esq.
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 N. Monroe Street, Suite 400
Tallahassee, FL 32301

Patricia Christensen, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 370
Tallahassee, FL 32399-0850



Kenneth A. Hoffman, Esq.

AT&T/tcg.extension