

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing) Docket No. 990649-TP
of Unbundled Network Elements)
(Phase III -- Verizon/Sprint)) Filed: June 5, 2001
_____)

**NOTICE OF WITHDRAWAL OF MOTION REGARDING BSTLM
AND
MOTION FOR CONTINUANCE**

MCI WorldCom, Inc., and its operating subsidiaries (collectively, "WorldCom") and AT&T Communications of the Southern States, Inc. (AT&T) hereby file their Notice of Withdrawal of Motion Regarding BSTLM. WorldCom and AT&T, together with Covad Communications Corporation (Covad), hereby file their Motion for Continuance. In support of this notice and motion, WorldCom, AT&T and Covad state:

Notice of Withdrawal

1. WorldCom and AT&T hereby withdraw their "Motion to Require BellSouth to Authorize Use of its BSTLM, to Require Verizon to Provide Data and Inputs for the BSTLM, and to Continue the Hearing" previously filed in this docket on May 17, 2001.

Motion for Continuance

2. WorldCom, AT&T and Covad hereby request that the final hearings in Phase III of this docket relating to Verizon and Sprint be continued until after conclusion of the additional Phase II proceedings involving BellSouth, or until approximately February/March 2002.

3. Movants request the continuance because resource limitations will make it impossible for them to fully analyze and respond to the Verizon and Sprint cost studies if the current schedule in this docket is maintained. Movants have limited resources and are involved

in numerous regulatory proceedings in Florida and other southeastern states. These include: (i) the additional hearings regarding BellSouth's UNE cost studies to be held in Phase II of this docket; (ii) the upcoming hearings in Phase II of Docket No. 000075-TP, relating to a number of competitive issues; (iii) the on-going 3rd party testing of BellSouth's OSS; (iv) BellSouth's recently filed application for 271 relief in Docket 960896-TP; and (v) BellSouth's applications for 271 relief in other states in its region.

4. Movants have contacted counsel for Verizon and are authorized to represent that Verizon does not oppose this motion for continuance provided the following conditions (which Movants accept) are met:

(a) Movants withdraw their pending motion regarding the use of BSTLM in the Verizon phase of this docket. This withdrawal has been accomplished by this pleading.

(b) Verizon is permitted to withdraw the cost study and testimony filed on May 18, 2001 and to refile an updated study and testimony for the rescheduled hearing.

(c) The rates ultimately set in this docket for non-recurring loop qualification costs (loop makeup information) will be retroactive to October 2, 2001, the date of the currently scheduled agenda conference in Phase III of this docket.

5. Movants have been unable to contact Sprint to determine its position on this motion.

6. If this Motion for Continuance is granted, Movants will cooperate with Verizon and Sprint to suggest to the staff and the Commission a workable schedule for the further activities required in this docket.

WHEREFORE, Movants respectfully request that:

(a) the Commission acknowledge WorldCom and AT&T's withdrawal of their motion relating to BSTLM; and

(b) the Commission grant a continuance of the Verizon and Sprint portions of this docket until after the conclusion of the additional proceedings in Phase II of this docket related to BellSouth, with the parties to be directed to submit a specific proposal for new hearing dates and related prehearing activities within ten days of the order granting continuance.

RESPECTFULLY SUBMITTED this 5th day of June, 2001.

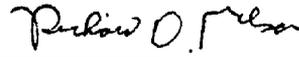


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivery (*) or facsimile (**) this 5th day of June, 2001.

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