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December 11, 2001

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 010409-TP and 010564-TX

Dear Ms. Bayó:

Enclosed for filing on behalf of Talk America, Inc. are an original and fifteen copies of Talk America's Request for Extension of Time in the above referenced dockets.

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

Thank you for your assistance with this filing.

Sincerely,


Norman H. Horton

NHH/amb
Enclosures

cc: Francie McComb, Esq.
Steve Augustino, Esq.

DOCUMENT NUMBER-DATE

15457 DEC 11 2001

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by the Citizens of)
Florida to Investigate TALK.com Holding)
Company and The Other Phone)
Company for Willful Violation of)
Rule 25-4.118, Florida Administrative)
Code)

Docket No. 010409-TP

_____)
In re: Investigation of possible violation of)
Commission Rules 25-4.118 and)
25-24.110, F.A.C., or Chapter 364, F.S.,)
by The Other Phone Company, Inc. d/b/a)
Access One Communications, holder of)
ALEC Certificate No. 4099, and Talk.com)
Holding Corp. d/b/a Network Services d/b/a)
The Phone Company, holder of ALEC)
Certificate No. 4692)

Docket No. 010564-TX
Filed: December 11, 2001

TALK AMERICA, INC.'S AMENDED REQUEST FOR EXTENSION OF TIME

COMES NOW Talk America, Inc., f/k/a Talk.com Holding Corp. d/b/a Network Services d/b/a The Phone Company and The Other Phone Company d/b/a Access One Communications ("Talk America" collectively) and files this Amended Request for Extension of Time and as basis states:

1. On November 1, 2001, Talk America filed a Motion for Clarification of Order No. PSC-01-2107-SC-TP issued October 23, 2001 and a Request for an Extension of Time to respond to the Order. In the Motion, Talk America requested a list or schedule of the specific complaints that are the basis of the alleged violations and that such information be provided by billed telephone number and customer name so that an adequate response could be framed. Talk America also requested that the Commission grant an extension of time to file a response from 21 days after the

order was issued to 30 days after the requested documents are provided to Talk America. This request is to amend the initial motion and request an extension so that a response be due 60 days after the information is provided.

2. Pending before the Commission is a Recommendation to grant in part the Motion for Clarification and require that Staff provide copies of the consumer complaint forms which are the basis of the Order but deny the request that the complaints be provided by BTN. The Recommendation also proposes granting the Request for Extension of Time.

3. Talk America does not object to the Recommendation but in order to respond to the Order with specific allegations of fact and law, the information to be provided by Staff will have to be compared to the Talk America records in order to frame an accurate response. Regardless of how the data is provided, this manual comparison will be required.

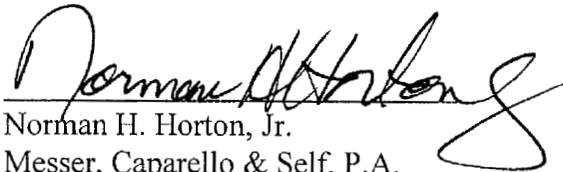
4. The preparation of the response will require a substantial amount of time given the volume of complaints noted in the Order. Talk America has limited resources to dedicate to this effort and those resources are further challenged by having to prepare for other proceedings and responses and because of the pending holiday period. The Commission is conducting or has recently concluded an audit which has required attention by Talk America representatives, there is a pending production of documents and formal hearings are currently scheduled in other jurisdictions which would overlap the time for the response to the show cause to be prepared and filed. Given the tasks to be performed and the resources available to complete those tasks and comply with Order No. PSC-01-2107-SC-TP, Talk America requests that the Request for Extension of Time be modified

to allow the filing of a response not later than 60 days from the date the documents are provided by Staff.

5. Counsel for Talk America has discussed this request with both counsel for Office of Public Counsel and Staff. The Office of Public Counsel does not object to the Request; however, Staff has advised Talk America that they do have an objection.

WHEREFORE, for the reasons cited, Talk America requests that the Modified Request be granted and Talk America provided 60 days from the date the information is provided by Staff to respond to Order No. PSC-01-2107-SC-TP.

Respectfully submitted



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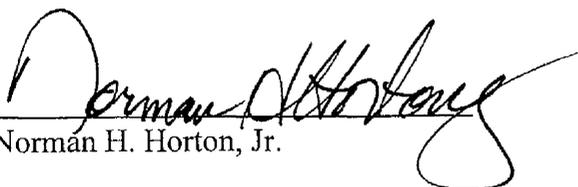
Attorneys for Talk America, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of Talk America, Inc.'s Amended Request for Extension of Time in Docket Nos. 010409-TP and 010564-TX have been served upon the following parties by Hand Delivery (*) and/or U.S. Mail this 11th day of December, 2001.

Mary Ann Helton, Esq.*
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Charles Beck, Esq.*
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