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December 27, 2001

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

HAND DELIVERY

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01 DEC 27 PM 2:03
COMMISSION
CLERK

Re: Docket No. 011615-TP

Dear Ms. Bayo:

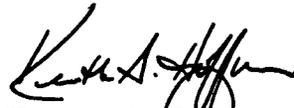
Enclosed herewith for filing in the above-referenced docket on behalf of KMC Telecom III, Inc. ("KMC") are the following documents:

1. Original and fifteen copies of KMC's Motion for Extension of Time to File Response to Sprint-Florida, Inc.'s Motion to Dismiss.

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,


Kenneth A. Hoffman

APP _____
 CAF _____
 CMP _____ KAH/vp
 COM _____ Enclosures
 CTR _____ cc: All Parties of Record
 ECR _____ PAUSERS\ROXANNE\kmc\Bayo.3.wpd
 LEG _____
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DOCUMENT NUMBER-DATE
16115 DEC 27 2001
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of KMC Telecom III, Inc.,)
For Enforcement of Interconnection Agree-)
ment with Sprint-Florida, Inc..)
_____)

Docket No.: 011615-TP

Filed: December 27, 2001

**KMC'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
SPRINT-FLORIDA, INCORPORATED'S MOTION TO DISMISS**

KMC Telecom III, Inc. ("KMC"), by and through its undersigned counsel, and pursuant to Rule 25-106.204(1), Florida Administrative Code, respectfully moves for a ten (10) day extension of time to file its Response to the Motion to Dismiss filed by Sprint-Florida, Inc. ("Sprint"). In support of this motion, KMC states as follows:

1. On Christmas Eve, December 24, 2001, counsel for Sprint hand delivered and faxed a copy of Sprint's Motion to Dismiss KMC's Complaint. Pursuant to Rules 25-106.103 and 25-106.204(1), Florida Administrative Code, KMC's response to the Motion to Dismiss is due December 31, 2001. (New Year's Eve).

2. Local counsel for KMC, Kenneth A. Hoffman and Martin P. McDonnell, are currently or will be out of the office on brief holiday vacations through January 3, 2002. In addition, local counsel for KMC is working and coordinating with KMC's regulatory counsel in Washington D.C. with the law firm of Kelley, Drye, & Warren, LLP.

3. Local counsel for KMC requests additional time to research and respond to the issues raised in the motion to dismiss. In addition, local counsel for KMC will need additional time upon return from vacation to coordinate with the Kelley, Drye & Warren law firm in the preparation and drafting of KMC's Response to the Motion to Dismiss.

DOCUMENT NUMBER-DATE

16115 DEC 27 01

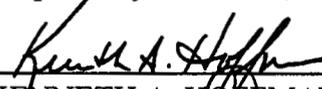
FPSC-COMMISSION CLERK

4. In view of the forgoing, KMC requests a ten (10) day extension up to and until January 10, 2002, for the filing of its Response to Sprint's Motion to Dismiss. Clearly, Sprint will in no way be prejudiced or harmed by the requested ten day extension.

5. The undersigned local counsel for KMC has attempted to contact counsel for Sprint and was advised by voice mail that counsel for Sprint would likewise be on vacation until January 2, 2002. Accordingly, local counsel for KMC is unable to represent Sprint's position in connection with this motion.

WHEREFORE, for the foregoing reasons, KMC respectfully requests that the Prehearing Officer grant this motion and authorize KMC up to and until January 10, 2002 for the filing of its Response to Sprint's Motion to Dismiss KMC's Complaint.

Respectfully submitted,



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Attorneys for KMC Telecom III, Inc.

CERTIFICATE OF SERVICE

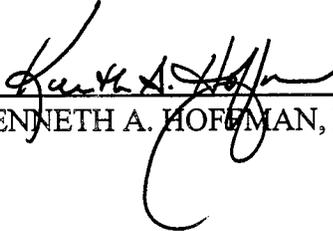
I HEREBY CERTIFY that a copy of the foregoing Complaint was furnished by U.S. Mail to the following this 27th day of December, 2001:

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