

Matilda Sanders

From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Monday, February 28, 2011 4:24 PM
To: Filings@psc.state.fl.us
Subject: 100434-TP AT&T Florida and Nexus' Joint Status Report and Proposed Joint Motion to Abate
Importance: High
Attachments: Document.pdf

A. Vickie Woods

BellSouth Telecommunications, Inc. d/b/a AT&T Florida

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B. Docket No. 100434-TP: Complaint and Petition for relief by Nexus Communications, Inc. against

BellSouth Telecommunications, Inc. d/b/a AT&T Florida for dispute over interpretation of interconnection agreement regarding cash back promotions

C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida

on behalf of Manuel A. Gurdian

D. 5 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Nexus Communications Inc.'s Joint Status Report and Joint Motion to Abate

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2/28/2011

DOCUMENT NUMBER-DATE

01320 FEB 28 =

FPSC-COMMISSION CLERK



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February 28, 2011

Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 100434-TP: Complaint and Petition for relief by Nexus Communications, Inc. against BellSouth Telecommunications, Inc. d/b/a AT&T Florida for dispute over interpretation of interconnection agreement regarding cash back promotions

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Nexus Communications, Inc.'s Joint Status Report and Proposed Joint Motion to Abate, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Manuel A. Gurdian

cc: All Parties of Record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.

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01320 FEB 28 =

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CERTIFICATE OF SERVICE
Docket No. 100434-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

First Class U.S. Mail this 28th day of February, 2011 to the following:

Martha Brown
Staff Counsel
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Manuel A. Gurdian

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Complaint and petition for relief by)
Nexus Communications, Inc. against BellSouth)
Telecommunications, Inc. d/b/a AT&T Florida)
for dispute over interpretation of) DOCKET NO. 100434-TP
interconnection agreement regarding cash back)
promotions.)**

JOINT STATUS REPORT AND PROPOSED JOINT MOTION TO ABATE

Nexus Communications, Inc. (“Nexus”) and BellSouth Telecommunications, Inc., d/b/a AT&T Florida (“AT&T Florida”) file this joint status report and proposed joint motion to abate.

Pursuant to an agreement between the parties, Nexus will file an amended complaint that identifies the promotions and amounts at issue in at least the same level of detail as set out in Exhibit A to the Amended Complaint Nexus filed in Docket No. U-31749 in Louisiana on February 9, 2011.

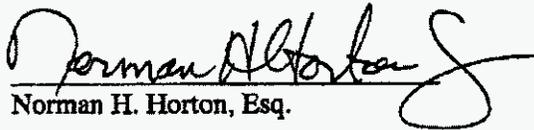
Upon the filing of the amended complaint, AT&T Florida and Nexus will file a joint motion asking that the Commission hold this proceeding in abeyance pending the the issuance of a Commission Order in the Consolidated Phase of Docket Nos. 100021-TP and 100022-TP.¹

¹ In accordance with the Joint Motion on Procedural Schedule filed on or about June 15, 2010, the Commission held the Consolidated Phase in abeyance while the parties proceed with hearings in companion proceedings in North Carolina, South Carolina, Alabama, and Louisiana. See Order No. PSC-10-0402-PCO-TP (issued June 18, 2010). Hearings were held in Louisiana on November 4 and 5, 2010, in South Carolina on December 17, 2010, in Alabama on January 21, 2011, and a hearing is scheduled in North Carolina for April 15, 2011. The parties simultaneously filed their initial post-hearing briefs in Louisiana on January 18, 2011. The parties’ simultaneous reply briefs are due in Louisiana on March 1, 2011, their post-hearing briefs are due in South Carolina on March 16, 2011, and the Parties anticipate that their initial briefs will be due in Alabama on April 1, 2011.

AT&T Florida will retain the right to file a motion to request that the Commission lift the abeyance if Nexus does not pay all amounts billed by AT&T Florida on a timely basis without withholding amounts it disputes.

Respectfully submitted,

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s/ Anton C. Malish
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