Southern Be c/o Marshall M. Criser Suite 400

-30-RECORDS/REPORTING

E. Barlow Keener Attorney

150 So. Monroe Street Tallahassee, FL 32301 Phone: (305) 530-5558

May 9, 1991

Mr. Steve C. Tribble Director, Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32301

Re: Docket No. 910022-TL - Bradford County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Extension of Time, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

ACK Y		Sincerely yours	5,
AFA	~	Z Bonlow K	een
A; 12	-	E. Barlow Keen	er
C/ Enc	tosures		
01102	Autr		
CR cc:	All Parties of Record A. M. Lombardo		
	_ Harris R. Anthony		
LEG 1 W/2	R. Douglas Lackey		
LIN 6	_		
000	RECEIVED & FILED		
RCH	- WELLED		
S50 _L		_	
WAS	EPSC BUREAU OF RECORDS	Detail of the second of the se	DOCUMENT NUMBER-DATE
OTH	-	A BELLSOUTH Company	04608 MAY-9 1991

CERTIFICATE OF SERVICE Docket No. 910022-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 9^{th} day of May, 1991 to:

Charles Murphy Division of Legal Services Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0863

Richard H. Brashear ALLTEL Florida, Inc. Post Office Box 550 Live Oak, Florida 32060

Sam Wahlen Central Telephone Company Post Office Box 2214 Tallahassee, Florida 32316

David B. Erwin, Esq.
Mason, Erwin & Horton, PA
1311-A Paul Russel Road, Suite 101
Tallahassee, Florida 32301

E. Barlow Keem

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution by Bradford County Commission requesting extended area service within Bradford County, Union County, and Gainesville. Docket No. 910022-TL

Filed: May 9, 1991

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S MOTION FOR EXTENSION OF TIME

COMES NOW Southern Bell Telephone and Telegraph Company
("Southern Bell" or "Company"), pursuant to Rule 25-22.037,
Florida Administrative Code, hereby moves the Florida Public
Service Commission ("Commission") for a thirty-day extension of
time in which to file traffic studies in the above-referenced
docket, and as grounds therefore states:

- 1. Commission Order No. 24208, issued on March 8, 1991, directed Southern Bell to prepare and submit traffic studies of routes between Bradford County and Union County by May 7, 1991. As explained below, Southern Bell was not able to complete the traffic studies by May 7, 1991 and therefore is requesting an extension of time to complete the studies.
- 2. Because of a limitation in Southern Bell's computer system, Southern Bell was not able to prepare the Bradford County and Union County traffic study within the time frame permitted by Order No. 24208. When Southern Bell received Order No. 24208, Southern Bell was using its computer system to develop the Gilchrist County and Deland County traffic studies. See Docket No. 870790-TL and Docket No. 910029-TL. Because Southern Bell was using its computer system to perform these two studies,

OCUMENT NUMBER-DATE

04608 MAY -9 1991

SC-RECORDS/REPORTING

Southern Bell was not able to begin preparing the Bradford County and Union County studies. On April 24, 1991, Southern Bell completed the Gilchrist County and Deland County traffic studies and subsequently initiated the development of the study required by Order No. 24208. Southern Bell expects the Bradford County and Union County studies to be completed on or before June 6, 1991.

3. The requested extension will not prejudice any party to this proceeding and will facilitate a reasoned, informed decision by this Commission.

WHEREFORE, Southern Bell Telephone and Telegraph Company respectfully requests that the Commission grant it a thirty-day extension until June 6, 1991, in which to respond to Order No. 24208.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY

General Attorney-Florida c/o Marshall M. Criser, III 150 So. Monroe St., Suite 400 Tallahassee, Florida 32301

305-530-5555

E. BARLOW KEENER

General Attorney

c/o Marshall M. Criser, III 150 So. Monroe St., Suite 400 Tallahassee, Florida 32301

305-530-5558