

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(904) 224-9115 FAX (904) 222-7560

August 20, 1996

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

ACK

Re: Resolution of Petition to Establish Non
Discriminatory Rates, Terms, and Conditions
for Resale Involving Local Exchange
Companies and Alternative Local Exchange
Companies pursuant to Section 364.161,
Florida Statutes - Docket No. 950984-TP

ASA

APP

CAF

Chase

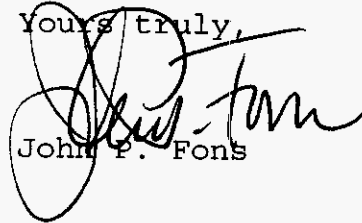
Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the
original and fifteen (15) copies of Sprint-United/Centel's Motion
for an Extension of Time to File Cost Studies and Rates Required by
Commission Order No. PSC-96-0811-FOF-TP.

Please acknowledge receipt and filing of the above by stamping
the duplicate copy of this letter and returning the same to this
writer.

Thank you for your assistance in this matter.

Yours truly,



John P. Fons

Enclosures

cc: All parties of record (w/encl.)

utd\950984.by0

DOCUMENT NUMBER-DATE

08731 AUG 20 1996

FPSC-18 COMB/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to)
Establish Non Discriminatory Rates,))
Terms, and Conditions for resale)
Involving Local Exchange)
Companies and Alternative Local)
Exchange Companies pursuant to)
Section 364.161, Florida Statutes)
_____)

DOCKET NO. 950984-TP
DATED: August 20, 1996

**SPRINT UNITED/CENTEL'S MOTION FOR AN EXTENSION
OF TIME TO FILE COST STUDIES AND RATES REQUIRED
BY COMMISSION ORDER NO. PSC-96-0811-FOF-TP**

Pursuant to Rule 25-22.037(2)(b), Florida Administrative Code, United Telephone Company of Florida and Central Telephone Company of Florida (together "Sprint United/Centel") move the Florida Public Service Commission ("the Commission") to extend its time for filing certain cost studies and proposed terms, conditions and rates required by Order No. PSC-96-0811-FOF-TP ("Order"), stating as follows:

1. On June 24, 1996, the Commission issued its Order in this proceeding requiring, inter alia, Sprint United/Centel to file cost studies and proposed terms, conditions and rates "no later than 60 days following the issuance of this Order." Order, pages 30 and 33. The last date for filing these tariffs is August 23, 1996. The cost studies and rates referenced in the Order relate to Sprint United/Centel's nonrecurring cost of converting bundled loops to unbundled loops and the proposed prices therefor which may be utilized by an Alternative Local Exchange Company ("ALEC"), such as Metropolitan Fiber Systems of Florida, Inc. ("MFS"), to provide

DOCUMENT NUMBER-DATE

0873 | AUG 20 96

FPSC-BL/CDROS/REPORTING 2210

competitive local exchange services. Sprint United/Centel was also ordered by the Commission to provide recurring cost studies for four different unbundled loops and six different unbundled ports. The recurring cost studies will be provided as required by August 23, 1996.

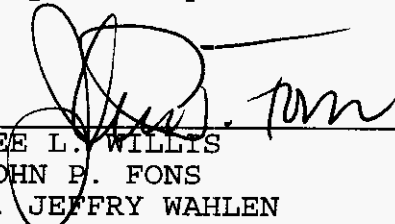
2. Sprint United/Centel is in the process of preparing the costs and rates required for converting bundled loops to unbundled loops, but the nonrecurring costing cannot be completed by August 23, 1996. A significant amount of work has already been invested in this effort. A corporate task force has developed Competitive Local Exchange Company (CLEC) methods and procedures which include the procedures for ordering and provisioning unbundled loops. A Sprint-Florida team is working to determine the specifics of how to implement these procedures, including the identification of the required time associated with each activity in the ordering and provisioning of unbundled loops. This is a time-consuming process because this is an uncharted area with no past experience to draw from. In any event, this work should be completed within the next 30 days, and Sprint will file the required cost studies and rates on or before October 1, 1996.

3. Sprint does not believe that the delay in furnishing the nonrecurring costs and proposed terms, conditions and rates should negatively impact MFS, the only petitioning party. Sprint United/Centel has not yet received a request for unbundled loops. Should MFS request a bundled loop to be unbundled, MFS may, in the interim, pay the existing tariffed nonrecurring rates associated

with the establishment of service. If, when the costs and rates have been furnished, the nonrecurring rate established is lower than the currently tariffed rate, Sprint will refund to MFS any amounts overpaid.

WHEREFORE, having shown good cause for delaying the filing of the nonrecurring conversion cost studies and proposed rates required by the Commission's Order, Sprint United/Centel respectfully request that this Motion be granted and Sprint United/Centel be granted an extension of time to October 1, 1996, to file the required cost studies and proposed rates.

Respectfully submitted,



LEE L. WILLIS
JOHN P. FONS
J. JEFFRY WAHLEN
Ausley & McMullen
P. O. Box 391
Tallahassee, Florida 32302
(904) 224-9115

ATTORNEYS FOR UNITED TELEPHONE
COMPANY OF FLORIDA AND CENTRAL
TELEPHONE COMPANY OF FLORIDA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 20th day of August, 1996, to the following:

Donna Canzano *
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd., Rm 370
Tallahassee, FL 32399-0850

Donald L. Crosby
Continental Cablevision, Inc.
Southeastern Region
7800 Belfort Parkway, Suite 270
Jacksonville, FL 32256-6925

Anthony P. Gillman
Kimberly Caswell
GTE Florida Incorporated
Post Office Box 110, FLTC0007
Tampa, FL 31601-0110

Steven D. Shannon
MCI Metro Access Transmission
Svcs., Inc.
2250 Lakeside Blvd.
Richardson, TX 75082

Leslie Carter
Digital Media Partners
1 Prestige Place, Suite 255
2600 McCormack Drive
Clearwater, FL 34619-1098

Rich Rindler
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, DC 20007

David Erwin
Young Van Assenderp et al.
Post Office Box 1833
Tallahassee, FL 32302-1833

Richard A. Gerstemeier
Time Warner AxS of FL, L.P.
2251 Lucien Way, Suite 320
Maitland, FL 32751-7023

Leo I. George
Lonestar Wireless of FL, Inc.
1146 19th Street, NW, Suite 200
Washington, DC 20036

Robert S. Cohen
Pennington Law Firm
Post Office Box 10095
Tallahassee, FL 32302

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, FL 32302

Andrew D. Lipman
Metropolitan Fiber Systems of
FL, Inc.
One Tower Lane, Suite 1600
Oakbrook Terrace, IL 60181-
4630

Richard D. Melson
Hopping Boyd Green et al.
Post Office Box 6526
Tallahassee, FL 32314

J. Phillip Carver
c/o Nancy H. Sims
BellSouth Telecommunications
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

John Murray
Payphone Consultants, Inc.
3431 NW 55th Street
Ft. Lauderdale, FL 33309-6308

Patricia Kurlin
Intermedia Communications of FL
3625 Queen Palm Drive
Tampa, FL 33619

Gary T. Lawrence
City of Lakeland
501 East Lemon Street
Lakeland, FL 33801-5079

Jill Butler
Digital Media Partners/
Time Warner Communications
2773 Red Maple Ridge
Tallahassee, FL 32301

Graham A. Taylor
TCG South Florida
1001 W. Cypress Creek Rd.,
Suite 209
Ft. Lauderdale, FL 33309-1949

Clay Phillips
Utilities & Telecommunications
Room 410
House Office Building
Tallahassee, FL 32399

Greg Krasovsky
Commerce & Economic
Opportunities
Room 4265
Senate Office Building
Tallahassee, FL 32399

Charles Beck
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Nels Roseland
Executive Office of the
Governor
Office of Planning & Budget
The Capitol, Room 1502
Tallahassee, FL 32399

Paul Kouroupas
Director, Regulatory Affairs
Teleport Communications Group
Two Teleport Drive, Suite 300
Staten Island, NY 10311

Floyd R. Self
Messer, Caparello, et al.
Post Office Box 1876
Tallahassee, FL 32302
jjw\utd\950984.mfe

Michael W. Tye
AT&T
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301

Robin D. Dunson
1200 Peachtree Street, NE
Promenade I, Room 4038
Atlanta, GA 30309

Sue E. Weiske
Time Warner Communications
160 Inverness Drive West
Englewood, CO 80112

Laura L. Wilson
FCTA
310 North Monroe Street
Tallahassee, FL 32301

Ken Hoffman
Rutledge, Ecenia, et. al
215 S. Monroe Street, Suite 420
Tallahassee, FL 32301-1841

Jodie Donovan-May
Eastern Region Counsel
Teleport Communications Group
1133 21st Street, NW, Suite 400
Washington, DC 20036

Mark K. Logan
Bryant, Miller and Olive
201 S. Monroe Street, Suite 500
Tallahassee, FL 32301

Timothy Devine
Metropolitan Fiber Systems
6 Concourse Pkwy., Suite 2100
Atlanta, GA 30328


ATTORNEY