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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

50 SEP 11 AM 9: 15

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Petition for Emergency Relief of Supra) Telecommunications and Information) Systems, Inc., Against BellSouth) Telecommunications, Inc.)

ACK _____

AFA _____

CAF .

CMU ____

EAG __

OPC _

RCH _

WAS _____

LEG LIN Docket No. 980800-TP

Filed: September 11, 1998

RECORDS AND REPORTING

MOTION FOR LEAVE TO FILE DIRECT TESTIMONY OF OLUKAYODE A. RAMOS AND DAVID A. NILSON ONE DAY LATE

Supra Telecommunications and Information Systems, Inc., by and through its undersigned counsel, hereby moves the Commission for leave to file the direct testimony of Olukayode A. Ramos and David A. Nilson in this proceeding one day late, and as grounds therefor states:

- Supra Telecommunications and Information Systems, Inc., has recently experienced difficulties with its e-mail connection between its Miami and Tallahassee offices. This has resulted in up to twenty-four hour delays in transferring testimony drafts for review between the offices. This has greatly aggravated the timeliness of the process of drafting and revising this testimony.
- 2. Supra also experienced serious delays in its preparation of this testimony as a result of changes being made inadvertently to the wrong version of the testimony which was not discovered until very late in the process of preparing the testimony.
- 3. In spite of these difficulties, Supra made every effort to get this testimony filed on the due date of September 10, 1998, which is

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OPSC-RECORDS/REPORTING

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demonstrated by the fact that Supra's employee was at the Clerk's office less than five minutes past 5:00 PM on September 10, 1998, but the office was closed.

- Supra filed its testimony by 9:00 AM on September 11, 1998, and has provided the other parties to the proceeding with a copy of the testimony by hand delivery as early as possible on September 11, 1998.
- Supra respectfully submits that no party will be prejudiced by the Commission granting this request.
- 6. The due date for the filing of testimony is a procedural matter in which the Commission has the discretion to grant Supra's request.

Wherefore, Supra respectfully requests the Commission to grant it leave to file its direct testimony of Olukayode A. Ramos and David A. Nilson one day late.

Respectfully submitted, this 11th day of September, 1998. 4 m 4 h

SUZANNE F. SUMMERLIN SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC. 1311-B Paul Russell Road, Suite 201 Tallahassee, Florida 32301 (850) 656-2288

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by hand delivery to the following individuals this 11th day of September, 1998:

Nancy B. White, Esq. c/o Ms. Nancy Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301

-, 2,

Beth Keating, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

SUZANNE F. SUMMERLIN