



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Complaint of Global NAPs, Inc., Against BellSouth Telecommunications, Inc., for Enforcement of Section VI(B) of its Interconnection Agreement with BellSouth Telecommunications, Inc., and Request for Relief.

Docket No. 991267-TP Filed November 16, 1999

GLOBAL NAPS, INC.'S MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY

Pursuant to Florida Administrative Code Rule 28-106.204, Florida Administrative Code, Global NAPs, Inc., moves the Commission to extend the timeframe and deadline for filing direct testimony in Docket No. 991267 from November 16, 1999, to November 24, 1999. As grounds for this Motion, Global NAPs states the following:

- 1. The timeframes in this case have been accelerated per Order of this Commission, as agreed by the parties. Global NAPs has experienced delay in obtaining the direct testimony of a witness in this proceeding, and requires a small extension of time to obtain that testimony.
- 2. The requested extension of time to file direct testimony will not affect the other timeframes established by the Commission in this case.
 - 3. Counsel for Global NAPs has contacted Commission staff and counsel for BellSouth

regarding the requested extension, and both have agreed to the extension.

WHEREFORE, Global NAPs, Inc., respectfully requests the Prehearing Officer to enter an order extending the timeframe and deadline for filing direct testimony by the parties to

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SC-BUREAU OF PECORDS

DOCUMENT NUMBER - DATE

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FPSC-RECORDS/REPORTING

November 24, 1999.

Respectfully submitted,

Jon C. Moyle, Jr.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished this 16th day of November, 1999 by hand delivery to Nancy White, General Counsel, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, FL 32301, and by U.S. Mail to Michael P. Goggin, BellSouth Telecommunications, Inc., Museum Tower, Suite 1910, 150 West Flagler Street, Miami, FL 33130, and R. Douglas Lackey and E. Earl Edenfield, Jr., BellSouth Telecommunications, Inc., BellSouth Center, Suite 4300, 675 W. Peachtree Street, N.E., Atlanta, GA 30375.

i C. Moyle, Jr.