HUEY, GUILDAY & TUCKER, P.A.

ATTORNEYS AND COUNSELORS AT LAW

P.O. BOX 12500

TALLAHASSEE, FLORIDA 32317-2500

www.hueylaw.com

e-mail: andy@hueylaw.com

ORIGINAL

GOVERNMENTAL AFFAIRS OFFICE: 201 SOUTH MONROE STREET

SUITE 200 TALLAHASSEE, FLORIDA 32301 FAX: (850) 224-3590

January 11, 2001

BY HAND DELIVERY THIS DATE COLUMN THE PROPERTY OF THE PROPERTY

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

Re: Docket #990750-TP; Petition for Arbitration by ITC^DeltaCom Communications

Dear Ms. Bayo:

MAIN OFFICE:
1983 CENTRE POINTE BOULEVARD

SUITE 200

TALLAHASSEE, FLORIDA 32308 FAX: (850) 222-2593

On behalf of Petitioner ITC^DeltaCom Communications, Inc., enclosed for filing are an original and 15 copies of a Second Agreed Motion for Extension of Time. Please file stamp the extra enclosed copy and return it to our runner. Thank you for your assistance.

Sincerely,

HUEY, GUILDAY & TUCKER, P.A.

J. Andrew Bertron, Jr.

JAB/
Enclosures
V:\wp\andy berton\Old\ITC\Clerk22.ltr.wpd

APP	nem extension defends
CMP	2
CTR	
ECR LEG	TAXABLE CONTRACTOR OF THE PARTY
OPG PAI	
RGO.	Carpananian economity
SER	
OTH.	

RECEIVED & FILED

PPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00504 JAN 11 a

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by ITC^DeltaCom)	
Communications, Inc. d/b/a ITC^DeltaCom)	Docket No. 990750-TP
for Arbitration of Certain Unresolved Issues in)	
Interconnection Negotiations Between)	
ITC^DeltaCom and BellSouth)	
Telecommunications, Inc.)	

Second Agreed Motion for Extension of Time

ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom ("ITC^DeltaCom"), and BellSouth Telecommunications, Inc., ("BellSouth"), submit this Second Agreed Motion for Extension of Time ("Motion") and in support state as follows:

- 1. On November 22, 2000, the Commission issued its Final Order on Arbitration, Order No. PSC-00-2233-FOF-TP, in this proceeding. Therein, the Commission ordered the parties to submit a signed interconnection agreement compliant with its decisions within twenty days of the issuance of the Final Order.
- 2. On December 12, 2000, the parties submitted a joint Agreed Motion for Extension of time to January 11, 2001, to submit a signed interconnection agreement.
- The parties are still in the process of finalizing the interconnection agreement.
 On January 10, 2001, BellSouth's office contacted ITC^DeltaCom and requested that
 ITC^DeltaCom file a second request for extension of time.
- 3. ITC^DeltaCom is authorized to represent that BellSouth joins in and consents to this motion. Thus, the parties hereby request that the Commission grant an extension of time to February 12, 2001 for filing the interconnection agreement.

DOCUMENT NUMBER-DATE

00504 JAN II a

FPSC-RECORDS/REPORTING

J. Michael Huey (Fla. Bar # 0130971)
J. Andrew Bertron, Jr. (Fla. Bar # 982849)
Huey, Guilday & Tucker, P.A.
1983 Centre Pointe Blvd., Suite 200
Tallahassee, Florida 32308
P. O. Box 12500
Tallahassee, Florida 32317-2500
850/224-7091 (telephone)
850/220-2593 (facsimile)

Nanette S. Edwards Regulatory Attorney ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom 4092 S. Memorial Parkway Huntsville, Alabama 35802 PH: (256) 382-3856

FAX: (256) 382-3936

Attorneys for ITC^DeltaCom

CERTIFICATE OF SERVICE DOCKET NO. 990750-TP

I hereby certify that a true and correct copy of the foregoing has been furnished to the following this 11th day of January, 2001:

Diana Caldwell
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
By Hand Delivery

Nancy B. White Michael P. Goggin BellSouth Telecommunications, Inc. 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (Facsimile and U.S. Mail)

R. Douglas Lackey
Bennett Ross
E. Earl Edenfield, Jr.
BellSouth Telecommunications, Inc.
Suite 4300, BellSouth Center
675 W. Peachtree Street, N.E.
Atlanta, Georgia 30375
By Facsimile and U.S. Mail

Attorney

V:\wp\andy berton\Old\ITC\MotionExtendTime.wpd