LAW OFFICES

Messer, Caparello & Self

A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701 POST OFFICE BOX 1876 Tallahassee, Florida 32302-1876 Telephone: (850) 222-0720 Telecopier: (850) 224-4359 Internet: www.lawfla.com

February 14, 2001

ORIGINAL PH 4: 2

BY HAND DELIVERY

Ms. Blanca Bayó, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: FPSC Docket No. 990455-TL, 990456-TL, 990457-TL, and 990517-TL

Dear Ms. Bayó:

Enclosed for filing on behalf AT&T Communications of the Southern States, Inc. are an original and fifteen copies AT&T's Motion for Extension of Time in the above-referenced dockets.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sinderely Floyd R. Self

FRS/amb Enclosure cc: Marsha Rule, Esq. Parties of Record

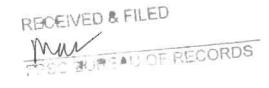
APP

CAF CMP COM CTR ECR

DP3 PAI

RGO

SEC SER OTH



DOCUMENT NUMBER - DATE

02119 FEB 145

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Review of Proposed Numbering Plan Relief for the 305/786 Area Code - Dade County and Monroe County/Keys Region))) Docket No. 990455-TL) _)
In re: Review of Proposed Numbering Plan Relief for the 561 Area Code)) Docket No. 990456-TP) _)
In re: BellSouth Telecommunications, Inc.'s Request for Review of Proposed Numbering Plan Relief for the 954 Area Code))) Docket No. 990457-TL))
In re: Review of Proposed Numbering Plan Relief for the 904 Area Code)) Docket No. 990517-TP) Filed: February 14, 2001)

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S MOTION FOR EXTENSION OF TIME

AT&T Communications of the Southern States, Inc. ("AT&T") hereby files this Motion for Extension of Time to delay the filing of testimony in this case until the Commission has addressed various pending offers of settlement to resolve the outstanding protests of Order No. PSC-00-1937-PAA-TP. In support of this motion, AT&T states as follows:

1. On October 6, 2000, the Commission issued Order No. PSC-00-1937-PAA-TP

("PAA Order"), which sets forth the Commission's determinations and actions adopting various area code relief plans for the 305/786, 954, 561, and 904 NPAs. Some portions of the PAA Order are final agency actions, and other portions of the decision are proposed agency action ("PAA").

2. On November 6, 2000, AT&T and other carrier parties to these dockets served a Joint Motion for Reconsideration and Request for Hearing on Proposed Agency Action ("PAA Motion"). The PAA Motion opposed the Commission's preliminary decision to implement code sharing in the Florida Keys and Miami-Dade County, Florida.

1

3. On November 13, 2000, BellSouth filed its Petition for Withdrawal or Modification of Proposed Agency Action, Or, In the Alternative, Formal Hearing on the PAA Order's PAA provisions pertaining to rate center consolidation in the Keys and Miami-Dade County ("BellSouth PAA Motion"). The BellSouth PAA Motion provisions with respect to the Keys has been resolved by Order No. PSC-01-0091-PAA-TL. As for the proposed rate center consolidation in Miami-Dade County, this is still an open issue.

4. On February 2, 2001, the parties to these dockets filed an offer of settlement with this Commission to resolve the outstanding PAA protest on code sharing and various other issues associated with the PAA Order. Also on February 2, 2001, BellSouth filed its Motion to Resolve Reconsideration or Challenges to Rate Center consolidation for the Miami-Dade 305/786 Region to resolve its protest of the rate center consolidation issue.

5. The current case schedule in these proceedings calls for direct testimony pertaining to the PAA Motion and the BellSouth PAA Motion to be filed on Friday, February 16, 2001. AT&T believes that the filing of any testimony at this time would not be an efficient use of party or Commission resources since AT&T believes that the two pending offers of settlement will ultimately serve to resolve both protests, thus rendering the scheduled hearings moot. Alternatively, in view of the potential actions the Commission may take to resolve the offers of settlement, it may be more appropriate to have a meeting of the parties after Commission action on the offers of settlement to

determine an appropriate course to deal with whatever issues may remain, assuming the Commission does not resolve all issues. Accordingly, AT&T requests that the Commission postpone or extend the time for filing any direct testimony in this case until after the Commission has ruled on the two proposed settlement offers. It is AT&T's understanding that the offers of settlement may be heard by the Commission at the March 6, 2001, Agenda Conference, but any extension, postponement, or delay should be until after the Commission acts upon the offers of settlement.

6. Undersigned counsel has been authorized by each of the parties to the PAA Motion and the BellSouth PAA Motion that they agree and support this extension of time.

WHEREFORE, AT&T requests for itself and each of the parties to the PAA Motion and the BellSouth PAA Motion that the direct testimony now due on February 16th be delayed, that any further testimony and hearing dates in connection with the two PAA protests be postponed until after the Commission has ruled upon the pending offers of settlement, and that the Commission take any other necessary action consistent with this request.

Respectfully submitted,

MESSER, CAPARELLO & SELF, P.A. Post Office Box 1876 Tallahassee, FL 32302-1876 (850) 222-0720 F. ESO. FLOYD R. SE Attorneys for AT&T Communications of the Southern

Attorneys for AT&T Communications of the Southe States, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T Communications of the Southern States, Inc.'s Motion for Extension of Time in Docket Nos. 990455-TL, 990456-TL, 990457-TL, and 990517-TL has been served upon the following parties by Hand Delivery (*) and/or U.S. Mail this 14th day of February, 2001.

Beth Keating, Esq.* Division of Legal Services, Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Lee Fordham, Esq.* Division of Legal Services, Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Tim Vaccaro, Esq.* Division of Legal Services, Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

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

Angela Green, Esq. Florida Public Telecommunications Association 125 S. Gadsden St., Suite 200 Tallahassee, FL 32301

Charles J. Rehwinkel Susan Masterton F. Ben Poag Sprint-Florida, Incorporated MC FLTHO0107 P.O. Box 2214 Tallahassee, FL 32399-2214

Michael A. Gross

Vice President, Regulatory Affairs & Regulatory Counsel
Florida Cable Telecommunications Association, Inc.
246 East 6th Avenue
Tallahassee, FL 32303

Donna McNulty, Esq. WorldCom, Inc. The Atrium Building, Suite 105 325 John Knox Road Tallahassee, FL 32303

Mr. Richard H. Brashear ALLTEL Florida, Inc. 206 White Avenue, S.E. Live Oak, FL 32060-3357

Ms. Gwen Azama-Edwards City of Daytona Beach P.O. Box 2451 Daytona Beach, FL 32115-2451

Mr. Fritz Behring City of Deltona P.O. Box 5550 Deltona, FL 32728-5550

Carole Baris James Fowler Fowler, Barice Law Firm 28 W. Central Blvd. Orlando, FL 32801

Bruce May, Esq. Holland & Knight P.O. Drawer 810 Tallahassee, FL 32302

Mr. Bob Koslow News-Journal Corp. Southwest Volusia Bureau 1107 Saxon Blvd. Orange City, FL 32763

Ms. Deborah L. Nobles

Northeast Florida Telephone Company, Inc. P.O. Box 485 Macclenny, FL 32063-0485

Mr. Robert Weiss Volusia County 123 W. Indiana Ave. Room #205 DeLand, FL 32720

J. Jeffry Wahlen Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302

Harriet Eudy ALLTEL Florida, Inc. 206 White Avenue, S.E. Live Oak, FL 32060

Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell & Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Carolyn Marek Vice President of Regulatory Affairs Southeast Region Time Warner Communications 233 Bramerton Court Franklin, TN 37069

Marsha Rule, Esq. Tracy Hatch, Esq. AT&T 101 N. Monroe St., Suite 700 Tallahassee, FL 32301

Kenneth A. Hoffman, Esq. John R. Ellis, Esq. Rutledge, Ecenia, Purnell & Hoffman, P.A. P.O. Box 551 Tallahassee, FL 32302

Mr. D. Wayne Milby Lockheed Martin IMS Communications Industry Services 1133 15th Street, N.W. Washington, DC 20005

Omnipoint Communications 600 Ansin Blvd. Hallandale, FL 33009 Kimberly D. Wheeler Morrison & Foerster Law Firm 2000 Pennsylvania Avenue, NW Washington, DC 20006-1888

Joe Assenzo Sprint PSC Legal Department 49000 Main Street, 11th Floor Kansas City, MO 64112

Mr. Brian Sulmonetti WorldCom, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328

Gloria Johnson Associate General Counsel BellSouth Cellular Corp. 1100 Peachtree Street, N.E., Suite 910 Atlanta, GA 30309-4599

Kimberly Caswell GTE Florida Incorporated P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

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

Daniel H. Thompson Berger Davis & Singerman 215 S. Monroe St., Suite 705 Tallahassee/FI 32301

Floyd R. Self