T. MICHAEL TWOMEY Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0750

December 7, 2001

Mrs. Blanca S. Bayó Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

# Re: Docket No. 001797-TP (Covad Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc. and DIECA Communications, Inc. d/b/a Covad Communications Company's Joint Motion for an Additional Extension of Time, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

T. Michael Twomey T. Michael Twomey (KA)

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White

DOCUMENT NI MBER DATE

15366 DEC-7a

FPSC-COMMISSION CLERK

#### CERTIFICATE OF SERVICE Docket No. 001797-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Facsimile and Federal Express this 7th day of December, 2001 to the following:

Felicia Banks Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Fax. No. (850) 413-6250 fbanks@psc.state.fl.us

Covad Communications Company Ms. Catherine F. Boone (+) 10 Glenlake Parkway Suite 650 Atlanta, GA 30328-3495 Tel. No. (678) 222-3469 Fax. No. (240) 525-5673 cboone@covad.com Atty. for Covad

Joseph A. McGlothlin (+) Vicki Gordon Kaufman (+) McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, P.A. 117 South Gadsden Street Tallahassee, Florida 32301 Tel. No. (850) 222-2525 Fax. No. (850) 222-2525 Fax. No. (850) 222-5606 Atty. for Covad Jmcglothlin@mac-law.com vkaufman@mac-law.com

T. Michael Twomey T. Michael Twomey

(+) Signed Protective Agreement

### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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Petition for Interconnection Arbitration By DIECA Communications, Inc. d/b/a Covad Communications Company Against BellSouth Telecommunications, Inc. Docket No. 001797-TP

Filed: December 7, 2001

# JOINT MOTION FOR AN ADDITIONAL EXTENSION OF TIME

NOW Comes, BellSouth Telecommunications, Inc. ("BellSouth") and DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad"), who jointly ask this Commission for an additional fourteen (14) day extension of time or until December 21, 2001 in which to execute and file an interconnection agreement. On November 8, 2001, BellSouth and Covad jointly requested a thirty-day extension of time or until December 7, 2001 to file a final agreement with the Commission. Pursuant to Order No. PSC-01-2319-PCO-TP, the Commission granted BellSouth and Covad's request requiring the parties to file a final executed interconnection agreement with the Commission by December 7, 2001. The parties need the additional time to modify and revise rates in the final agreement. As both parties are seeking this extension, no party will be prejudiced by the granting of an additional fourteen (14) days in which to file a final interconnection agreement with the Commission.

WHEREFORE, for the foregoing reasons, BellSouth and Covad respectfully request that this Commission grant them an additional fourteen (14) days or until December 21, 2001 in which to file an executed, final interconnection agreement. Respectfully submitted this 7th day of December, 2001.

**BELLSOUTH TELECOMMUNICATIONS, INC.** 

NANCY E. WHITE ([A)

JAMES MEZA III c/o Nancy Sims 150 South Monroe Street, #400 Tallahassee, Florida 32301 (305) 347-5558

VA) RY DOUGLAS LACKEY

T. MICHAEL TWOMEY 675 West Peachtree Street, #4300 Atlanta, Georgia 30375 (404) 335-0747

# COVAD COMMUNICATIONS COMPANY

Knone

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