

J. PHILLIP CARVER  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

November 5, 2002

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

Re: Docket No. 000121A-TP (OSS)


Dear Ms. Bayó:

This letter is to formally request on behalf of BellSouth that the date for filing Additional Comments in response to the List of Disputed Items in this proceeding be postponed from November 8, 2002 to November 19, 2002.

On October 22, 2002, the Commission Staff sent to the parties a list of proposed changes to BellSouth's Service Quality Measurement Plan that the parties have not agreed upon. Staff requested that the parties provide additional comments, including any compromises that they are willing to make, by November 8, 2002. After reviewing the list, BellSouth has identified 120 disputed items. BellSouth's goal is to provide the Staff with a set of comments that will adequately address each of these issues, and that will provide information that will be useful in considering the respective positions of the parties. Doing so for 120 disputed items, however, can not be accomplished by November 8, 2002. For this reason, BellSouth requests that the response date be extended to November 19, 2002.

Granting this request will not prejudice any party to this proceeding, and it will, in fact, provide all parties with additional time to prepare their respective comments.

Thank you for your attention to this matter.

Sincerely,  
  
J. Phillip Carver (JA)

cc: All parties of record  
Marshall M. Criser, III  
Nancy B. White  
R. Douglas Lackey

DOCUMENT NUMBER-DATE

12167 NOV-5 02

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 000121A-TP**

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

U. S. Mail this 5<sup>th</sup> day of November, 2002 to the following:

Jason K. Fudge  
Tim Vaccaro  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6181  
Fax. No. (850) 413-6250  
[jfudge@psc.state.fl.us](mailto:jfudge@psc.state.fl.us)

AT&T  
Virginia C. Tate  
Senior Attorney  
1200 Peachtree Street  
Suite 8100  
Atlanta, GA 30309  
Tel. No. (404) 810-4922  
[vtate@att.com](mailto:vtate@att.com)

Verizon, Inc.  
Kimberly Caswell  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Tel. No. (813) 483-2617  
Fax. No. (813) 223-4888  
[kimberly.caswell@verizon.com](mailto:kimberly.caswell@verizon.com)

Nanette Edwards (+)  
Regulatory Attorney  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3936  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Scott A. Sapperstein  
Intermedia Communications, Inc.  
One Intermedia Way  
M.C. FLT-HQ3  
Tampa, Florida 33647-1752  
Tel. No. (813) 829-4093  
Fax. No. (813) 829-4923  
[sasapperstein@intermedia.com](mailto:sasapperstein@intermedia.com)

Charles J. Pellegrini  
Katz, Kutter, Haigler, Alderman, Bryant  
& Yon, P.A.  
106 East College Avenue  
Suite 1200  
Tallahassee, FL 32301  
Counsel for Intermedia  
Tel. No. (850) 577-6755  
Fax No. (850) 222-0103  
[jpellegrini@katzlaw.com](mailto:jpellegrini@katzlaw.com)  
Counsel for Intermedia  
[charlesp@katzlaw.com](mailto:charlesp@katzlaw.com)

Peter M. Dunbar, Esquire  
Karen M. Camechis, Esquire  
Pennington, Moore, Wilkinson,  
Bell & Dunbar, P.A.  
Post Office Box 10095 (32302)  
215 South Monroe Street, 2nd Floor  
Tallahassee, FL 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
[pete@penningtonlawfirm.com](mailto:pete@penningtonlawfirm.com)

Brian Chaiken  
Supra Telecommunications and  
Information Systems, Inc.  
2620 S. W. 27<sup>th</sup> Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4248  
Fax. No. (305) 443-1078  
[bchaiken@stis.com](mailto:bchaiken@stis.com)

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Susan Masterton  
Charles J. Rehwinkel  
Sprint  
Post Office Box 2214  
MS: FLTLHO0107  
Tallahassee, Florida 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Donna Canzano McNulty (+)  
MCI WorldCom, Inc.  
325 John Knox Road  
The Atrium, Suite 105  
Tallahassee, FL 32303  
Tel. No. (850) 422-1254  
Fax. No. (850) 422-2586  
[donna.mcnulty@wcom.com](mailto:donna.mcnulty@wcom.com)

Brian Sulmonetti  
MCI WorldCom, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5493  
Fax. No. (770) 284-5488  
[brian.sulmonetti@wcom.com](mailto:brian.sulmonetti@wcom.com)

William Weber, Senior Counsel  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor, Promenade II  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (508) 300-7749  
[wweber@covad.com](mailto:wweber@covad.com)

John Rubino  
George S. Ford  
Z-Tel Communications, Inc.  
601 South Harbour Island Blvd.  
Tampa, Florida 33602  
Tel. No. (813) 233-4630  
Fax. No. (813) 233-4620  
[gford@z-tel.com](mailto:gford@z-tel.com)

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, et. al  
117 South Gadsden Street  
Tallahassee, Florida 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
[jmclglothlin@mac-law.com](mailto:jmclglothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
Represents KMC Telecom  
Represents Covad  
Represents Mpower

Jonathan E. Canis  
Michael B. Hazzard  
Kelley Drye & Warren, LLP  
1200 19th Street, N.W., Fifth Floor  
Washington, DC 20036  
Tel. No. (202) 955-9600  
Fax. No. (202) 955-9792  
[jacanis@kelleydrye.com](mailto:jacanis@kelleydrye.com)  
[mhazzard@kelleydrye.com](mailto:mhazzard@kelleydrye.com)

Tad J. (T.J.) Sauder  
Manager, ILEC Performance Data  
Birch Telecom of the South, Inc.  
2020 Baltimore Avenue  
Kansas City, MO 64108  
Tel. No. (816) 300-3202  
Fax. No. (816) 300-3350

John D. McLaughlin, Jr.  
KMC Telecom  
1755 North Brown Road  
Lawrence, Georgia 30043  
Tel. No. (678) 985-6262  
Fax. No. (678) 985-6213  
[jmclau@kmctelecom.com](mailto:jmclau@kmctelecom.com)

Andrew O. Isar  
Miller Isar, Inc.  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335-8349  
Tel. No. (253) 851-6700  
Fax. No. (253) 851-6474  
[aisar@millerisar.com](mailto:aisar@millerisar.com)

Richard D. Melson  
Hopping Green Sams & Smith  
Post Office Box 6526  
Tallahassee, FL 32314  
Tel. No. (850) 222-7500  
Fax. No. (850) 224-8551  
[rickm@hgss.com](mailto:rickm@hgss.com)

Norman H. Horton, Jr. (+)  
Messer, Caparello & Self  
215 South Monroe Street  
Suite 701  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
Represents e.spire  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
[nhorton@law.fl.a.com](mailto:nhorton@law.fl.a.com)

Renee Terry, Esq.  
e.spire Communications, Inc.  
7125 Columbia Gateway Drive  
Suite 200  
Columbia, MD 21046  
Tel. No. (301) 361-4298  
Fax. No. (301) 361-4277

John Kerkorian  
Mpower Communications, Corp.  
5607 Glenridge Drive  
Suite 300  
Atlanta, GA 30342  
Tel. No. (404) 554-1217  
Fax. No. (404) 554-0010  
[jkerkorian@mpowercom.com](mailto:jkerkorian@mpowercom.com)

Suzanne F. Summerlin, Esq.  
1311-B Paul Russell Road  
Suite 201  
Tallahassee, FL 32301  
Tel. No. (850) 656-2288  
Fax. No. (850) 656-5589  
[summerlin@nettally.com](mailto:summerlin@nettally.com)

Dulaney O'Roark III (+)  
WorldCom, Inc.  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5498  
[De.OROark@mci.com](mailto:De.OROark@mci.com)

Claudia E. Davant  
AT&T  
State President Legislative and  
Regulatory Affairs  
101 N. Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
Fax. No. (850) 425-6361  
[cdavant@att.com](mailto:cdavant@att.com)

Wayne Stavanja/Mark Buechele  
Ann Shelfer  
Supra Telecommunications  
1311 Executive Center Drive  
Suite 200  
Tallahassee, FL 32301  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522

  
\_\_\_\_\_  
J. Phillip Carver (KA)

**(+) Signed Protective  
Agreement**

#237366