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Matilda Sanders

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Slaughter, Brenda [Brenda.Slaughter@BellSouth.com]

Sent:

Thursday, July 22, 2004 3:02 PM

To:

Filings@psc.state.fl.us

Cc:

Meza, James; Linda Hobbs; Nancy Sims; Fatool, Vicki; Holland, Robyn P; Bixler, Micheale

Subject:

Docket 040353-TP

Importance: High

Brenda Slaughter

Legal Secretary for James Meza III BellSouth Telecommunications, Inc. c/o Nancy Sims 150 South Monroe, Rm. 400 Tallahassee, Florida 32301-1558 (404) 335-0714 brenda.slaughter@bellsouth.com

Docket No. 040353-TP: Petition of Supra Telecommunications and Information В. Systems, Inc. to Review and Cancel BellSouth's Promotion Offering Tariffs Offered in Conjunction with its New Flat Rate Service Known as Preferred Pack

- BellSouth Telecommunications, Inc. C. on behalf of James Meza III
- D. 4 pages total
- BellSouth Telecommunications, Inc.'s Motion for Extension of Time E.

Brenda Slaughter (sent on behalf of James Meza III) BellSouth Telecommunications, Inc. Suite 4300 - Legal Department 675 W. Peachtree Street Atlanta, GA 30375-0001

Phone: (404) 335-0714

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JAMES MEZA III Attorney BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0769

July 22, 2004

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.: 040353-TP

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Motion for Extension of Time, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

James Meza III

Enclosures

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

DOCUMENT NUMBER-DATE
07997 JUL 22 8
FPSC-COMMISCION ST

CERTIFICATE OF SERVICE DOCKET NO. 040353-TP

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

First Class U.S. Mail and Electronic Mail this 22nd day of July, 2004 to the following:

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(*) Signed Protective Agreement

James Meza III BSS)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Supra Telecommunications		Docket No. 040353-TP
And Information Systems, Inc. to Review)	
And Cancel BellSouth's Promotional)	
Offering Tariffs Offered in Conjunction With)	
Its New Flat Rate Service Known as)	
Preferred Pack		Filed: July 22, 2004

BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.204(5), Florida Administrative Code, requests that the Florida Public Service Commission ("Commission") grant BellSouth a seven day extension of time in which to file Objections and Responses to Supra Telecommunications & Information Systems, Inc ("Supra") Requests to BellSouth. In support of this motion, BellSouth states the following:

- 1. Supra served it's Second Request for Admissions (Nos. 18-31) to BellSouth on July 15, 2004. Pursuant to Order No. PSC-04-0459-PCO-TP ("Procedural Order"), objections to these Admissions are due July 22, 2004 and Responses are due on July 26, 2004.
- 2. Supra served it's Third Set of Interrogatories (Nos. 28-30) and Third Request for Production (Nos. 17-18) to BellSouth on July 16, 2004. Objections to this discovery are due July 23, 2004 and responses are due July 26, 2004.
- 3. Because of undersigned's travel schedule and work load, BellSouth requests an extension of time to file objections and responses to Supra's most recent set of discovery until July 30, 2004.
- 4. No party would be prejudiced by this brief extension of time because no hearing date or testimony deadline date has been established in this docket. Further,

because of the expedited discovery deadlines established in the Procedural Order, even with the extension, Supra will receive responses to its discovery approximately two weeks prior to when they would otherwise be due.

5. BellSouth attempted to contact counsel for Supra to ascertain Supra's position regarding BellSouth's request. BellSouth was unable to obtain a response prior to the filing of this Motion.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that the Commission grant BellSouth a seven (7) day extension of time in which to file the aforementioned objections and responses.

Respectfully submitted this 22nd day of July, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHIT

c/o Nancy H. Sims 150 So. Monroe Street, Suite 400

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