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February 17, 2006

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. 041269-TP**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Motion to Amend Filing Date for Interconnection Agreement Amendments, 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,

  
Meredith Mays (BIA)

cc: All Parties of Record  
Jerry Hendrix  
R. Douglas Lackey  
Nancy B. White

**CERTIFICATE OF SERVICE**  
**Docket No. 041269-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Overnight Mail this 17<sup>th</sup> day of February, 2006 to the following:

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(+ )signed Protective Agreement  
(\* ) via FedEx

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: )  
 ) Docket No. 041269-TP  
Petition to Establish Generic Docket to )  
Consider Amendments to Interconnection )  
Agreements Resulting From Changes of Law ) Filed: February 17, 2006

**MOTION TO AMEND FILING DATE**  
**FOR INTERCONNECTION AGREEMENT AMENDMENTS**

1.

Pursuant to the Commission's February 7, 2006 decision in this docket, executed interconnection agreement amendments reflecting that decision must be filed with the Commission on February 27, 2006. BellSouth Telecommunications, Inc. ("BellSouth") requests the Commission modify that date to March 2, 2005.

2.

On February 17, 2006, Commission staff issued a recommendation that the Commission vacate its decision of issues 5, 13, 16-18, and 22(b); direct new staff members to review existing record and prepare new recommendation for de novo consideration. Staff also recommended that, if approved, the final order on non-vacated issues should be issued immediately and, relevant to this motion, that the Commission require filing of interconnection agreements and amendments compliant with decision on non-vacated issues or as a result of negotiation by 3/2/06.

3.

BellSouth understands staff's recommendation may be addressed at the February 28, 2006 agenda session. Because staff's recommendation will not be considered until after the February 27, 2006 amendment deadline, BellSouth respectfully requests the extension sought herein so that it can coordinate with its customers and submit the appropriate amendments to the Commission.

4.

Due to the time constraints involved, BellSouth has not asked if parties of record have any objection to this motion. BellSouth contacted counsel for Covad Communications and asked, prior to the issuance of the staff recommendation, if Covad had any conceptual disagreement with a motion such as this. Covad was unwilling to submit a joint motion to the Commission. BellSouth will serve all parties of record with this motion.

5.

The modified amendment filing date would be consistent with the filing date recommended by staff and would still allow the parties time to meet the FCC's transitional deadline of March 10, 2006.


6.

No party will be prejudiced by the granting of this motion. BellSouth will work cooperatively with impacted CLECs in Florida to satisfy the March 2, 2006 filing date.

Respectfully submitted this 17<sup>th</sup> day of February, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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