# ORIGINAL

## Matilda Sanders

From:Ann Bassett [abassett@lawfla.com]Sent:Friday, February 24, 2006 11:48 AMTo:Filings@psc.state.fl.usSubject:Docket 050581-TPAttachments:2006-02-24, 050581 Joint Motion for Extention of Time to File Direct Testimony 2.pdf

The person responsible for this electronic filing is:

Floyd R. Self Messer, Caparello & Self, P.A. P.O. Box 1876 Tallahassee, FL 32302-1876 (850) 222-0720 fself@lawfla.com

The Docket No. is 050581-TP - Complaint of KMC Telecom III LLC and KMC Telecom V, Inc. against Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership for alleged failure to pay intrastate access charges pursuant to interconnection agreement and Sprint's tariffs, and for alleged violation of Section 364.16(3)(a), F.S.

This is being filed on behalf of KMC Telecom III LLC and KMC Telecom V, Inc. (collectively "KMC") and Sprint-Florida, Incorporated ("Sprint-FL") and Sprint Communications Company Limited Partnership ("Sprint LP")

Total Number of Pages is 4

Joint Motion for Extension of Time to File Direct Testimony

Ann Bassett

Messer, Caparello & Self, P.A. Phone: 850-201-5225 abassett@lawfla.com

CMP \_\_\_\_\_ COM 3\_\_\_\_ CTR \_\_\_\_\_ ECR \_\_\_\_\_ GCL \_\_\_\_\_ GCL \_\_\_\_\_ OPC \_\_\_\_\_ RCA \_\_\_\_\_ SCR \_\_\_\_\_ SGA \_\_\_\_\_ SEC \_\_\_\_\_ OTH KIM P.

DOCUMENT NUMBER-DATE 0 1 6 1 2 FEB 24 % FPSC-COMMISSION CLERK

DRIGINAL

## LAW OFFICES Messer, Caparello & Self A Professional Association

Post Office Box 1876 Tallahassee, Florida 32302-1876 Internet: www.lawfla.com

February 24, 2006

### **BY ELECTRONIC FILING**

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 050581-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of KMC Telecom III LLC and KMC Telecom V, Inc. (collectively "KMC") and Sprint-Florida, Incorporated ("Sprint-FL") and Sprint Communications Company Limited Partnership ("Sprint LP"), is an electronic version of a Joint Motion for Extension of Time to File Direct Testimony in the above referenced docket:

Thank you for your assistance with this filing.

Sindere ly yours. Floyd R. Self

FRS/amb Enclosures cc: Parties of Record

FPSC-COMMISSION CLERK 90 첛 ß 2 ٥  $\bigcirc$ 

DOCUMENT NUMBER-DATE

DOWNTOWN OFFICE, 215 South Monroe Street, Suite 701 • Tallahassee, Fl 32301 • Phone (850) 222-0720 • Fax (850) 224-4359 NORTHEAST OFFICE, 3116 Capital Circle, NE, Suite 5 • Tallahassee, Fl 32308 • Phone (850) 668-5246 • Fax (850) 668-5613



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

Complaint of KMC Telecom III LLC and KMC Telecom V, Inc. against Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership for alleged failure to pay intrastate access charges pursuant to interconnection agreement and Sprint's tariffs, and for alleged violation of Section 364.16(3)(a), F.S.

Docket No. 050581-TP Filed: February 24, 2006

#### JOINT MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY

KMC Telecom III LLC and KMC Telecom V, Inc. (collectively "KMC") and Sprint-Florida, Incorporated ("Sprint-FL") and Sprint Communications Company Limited Partnership ("Sprint LP"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby move the Florida Public Service Commission (hereinafter "Commission") to extend the time testimony is due in this docket. As grounds therefore, KMC, Sprint-FL and Sprint LP state:

 Commission Order No. PSC-06-0054-PCO-TP issued January 23, 2006, set the due date for direct testimony as February 20, 2006 and the due date for rebuttal testimony as March 20, 2006.

2. On February 16, 2005 KMC, Sprint-FL, and Sprint LP requested a one-week extension of the due date for direct testimony which was granted by Order No. PSC-06-0367-PCO-TP issued February 20, 2006. The Parties have continued to negotiate to resolve various issues and believe that a further extension will facilitate the settlement process.

3. The requested extension will not impact the hearing date currently set in this docket.

WHEREFORE, KMC, Sprint-FL, and Sprint LP respectfully request that the Commission extend the deadline for submission of direct testimony through the close of business on Monday,

DOCUMENT NUMBER-DATE 01612 FEB 24 8 FPSC-COMMISSION OF STAT March 13, 2006 and the deadline for submission of rebuttal testimony through the close of business on Monday, April 10, 2006.

Respectfully submitted,

Floyd R. Self Messer, Caparello & Self, P.A. Post Office Box 1876 Tallahassee, FL 32302-1876 Telephone: (850) 222-0720 Facsimile: (850) 224-4359 e-mail: fself@lawfla.com Attorneys for KMC Telecom III LLC and KMC Telecom V, Inc. (by permission 51 Susan S. Masterton Sprint-Florida, Incorporated P. O. Box 2214 (MC FLTLHO0107) Tallahassee, FL 32316-2214 Telephone: (850) 599-1560 (850) 878-0777 Facsimile: e-mail: susan.masterton@mail.sprint.com Attorney for Sprint-Florida, Incorporated

rsha Kule

Marsha Rule Rutledge, Ecenia, Purnell and Hoffman, P.A. P.O. Box 551 Tallahassee, FL 32302-0551 Telephone: (850) 681-6788 Facsimile: (850) 681-6515 <u>marsha@reuphlaw.com</u> Attorney for Sprint Communications Company Limited Partnership

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail this 24<sup>th</sup> day of February, 2006

Lee Fordham, Esq. Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <u>cfordham@psc.state.fl.us</u>

William R. Atkinson, Esq.\*\*
Sprint Communications Company Limited Partnership
c/o Sprint Nextel
3065 Cumberland Circle (GAATLD0602-62)
Atlanta, GA 30339
<u>bill.atkinson@sprint.com</u>

Susan S. Masterton, Attorney Sprint-Florida Incorporated P. O. Box 2214 (MC FLTLHO0107) Tallahassee, FL 32316-2214 susan.masterton@sprint.com

Ms. Nancy Pruitt Division of Competitive Markets and Enforcement Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <u>npruitt@psc.state.fl.us</u>

Marsha Rule, Esq. Rutledge, Ecenia, Purnell and Hoffman, P.A. P.O. Box 551 Tallahassee, FL 32302-0551 marsha@reuphlaw.com

Floyd R.(Self