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> > June 18, 2007

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JONATHAN M. COSTELLO
MARGARET A. MENDUNI

Ann Cole Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re:

Fl Docket 000475-TP - Complaint Against Thrifty Call, Inc. Regarding Practices in Reporting PIU for Compensation

For Jurisdictional Access Services

Dear Ms. Cole:

Enclosed is an original and 15 copies of Thrifty Call's Unopposed Motion for Extension of Time to Respond to AT&T Florida's Motion for Summary Final Order, 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,
CMP	1
COM	Martin P. Mr CD-V
CTR	Martin P. McDonnell
ECRMPM/vp	
GCLcc: All parties of Record	
OPC	
RCA	
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FPSC-COMMISSION CLERK

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:)	
)	Docket No. 00475-TP
Complaint by BellSouth Telecommunications, Inc.)	
against Thrifty Call, Inc. regarding practices in the)	Filed: June 18, 2007
reporting of percent interstate usage for compensa-)	
tion for jurisdictional access services)	

THRIFTY CALL, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO AT&T FLORIDA'S MOTION FOR SUMMARY FINAL ORDER

Thrifty Call, Inc. ("Thrifty Call"), by and through undersigned counsel, and pursuant to Rule 28-106.204, Florida Administrative Code, respectfully submits this Unopposed Motion for Extension of Time to Respond to AT&T Florida's Motion for Summary Final Order in the instant docket. As grounds therefor, Thrifty Call states as follows:

- 1. On June 5, 2007, AT&T Florida filed a Motion for Summary Final Order. AT&T's Motion for Summary Final Order reflects that service of the Motion was sent to Mr. Floyd Self, Esq. on Thrifty Call's behalf. However, at the time the Motion was filed, Thrifty Call was not represented by Mr. Self, or any other counsel in the cause.
- 2. By way of background, on November 2, 2005, the Commission granted a motion filed by Mr. Self for leave to withdraw as Thrifty Call's counsel in the instant docket (Order No. PSC-05-1101-PCO-TP). No other counsel or qualified representative subsequently entered into the matter on behalf of Thrifty Call. Since November 2, 2005, the parties have been engaged in settlement negotiations and on February 22, 2007, BellSouth advised the Commission that the parties were still in negotiations and requested Commission postponement of the matter for sixty days or until further advised by either party. On April 23, 2007, BellSouth advised the Commission that the parties were unable to reach a negotiated settlement and that AT&T is therefore proceeding to move this docket

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toward closure. A copy of that motion was sent to Mr. Floyd Self, although Mr. Self no longer represented Thrifty Call.

3. Undersigned counsel was contacted on June 15, 2007, by Thrifty Call and retained

as counsel in this matter. Subsequently, undersigned counsel contacted James Meza, counsel of

record for BellSouth and Mr. Meza advised that he has no objection to this Commission granting an

extension of time to allow counsel to prepare and file a response to AT&T Florida's Motion for

Summary Final Order. Mr. Meza agreed to a ten (10) day extension.

4. AT&T Florida's Motion for Summary Final Order contains confidential information

(which undersigned counsel has not yet seen).

Wherefore, undersigned counsel respectfully requests that the Commission grant him 10 days

to respond to AT&T Florida's Motion for Summary Final Order from the date undersigned counsel

is served by BellSouth or AT&T Florida with a non-redacted copy of that Motion.

RESPECTFULLY SUBMITTED this 18th day of June, 2007.

KENNETH A. HOFFMAN, ESQUIRE

FLA BAR No.: 307718

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MARTIN P. MCDONNELL, ESQUIRE

FLA BAR No.: 031728

Rutledge, Ecenia, Purnell & Hoffman, P.A.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail to the following this 18th day of June, 2007:

Adam Teitzman Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

John R. Tyler
James Meza
BellSouth Telecommunications, Inc.
c/o Nancy Sims
150 South Monroe Street, Room 400
Tallahassee, Florida 32301-1558

Martin P. McDonnell, ESQ.

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