

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re:)
)
Complaint by BellSouth Telecommunications, Inc.)
against Thrifty Call, Inc. regarding practices in the)
reporting of percent interstate usage for compensa-)
tion for jurisdictional access services)
_____)

Docket No. 000475-TP

Filed: March 7, 2008

**THRIFTY CALL, INC.'S AMENDED UNOPPOSED MOTION FOR AN EXTENSION
OF TIME TO RESPOND TO AT&T FLORIDA'S THIRD SET OF
INTERROGATORIES
AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS**

Thrifty Call, Inc. ("Thrifty Call"), pursuant to Order No. PSC-07-1027-PCO-TP (the "Order Modifying Procedure"), issued December 28, 2007, hereby respectfully files this Amended Unopposed Motion for an extension of time to file its responses to AT&T's Third Set of Interrogatories (Nos. 51-71) and Third Request for Production of Documents (Nos. 23 & 24) to Thrifty Call in the captioned docket.

1. On February 20, 2008, AT&T Florida ("AT&T") served upon Thrifty Call its Third Set of Interrogatories (Nos. 51-71) and Third Request for Production of Documents (Nos. 23 & 24) to Thrifty Call in the above captioned docket. Thrifty Call has been diligently preparing its responses to the AT&T discovery requests. Unfortunately, because of the

_____ **COM** _____ unavailability of Thrifty Call witness Timothy J. Gates (to whom most of the discovery is
_____ **CTR** _____ directed) Thrifty Call was unable to have the responses filed by the date required in the Order
_____ **ECR** _____
_____ **GCL** 2 Modifying Procedure; March 6, 2008.¹

_____ **OPC** _____ 2. However, Thrifty Call can have the responses filed with the Commission and
_____ **RCA** 1 _____ served on the parties on March 14, 2008.
_____ **SCR** _____
_____ **SGA** _____

¹ In its Unopposed Motion for extension of time filed March 6, 2008, Thrifty Call erroneously stated that the discovery responses were due March 10, 2008.

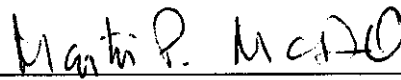
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_____ **OTH** _____

3. Undersigned counsel has discussed this request with Manuel A. Gurdian, counsel for AT&T, who advised that he has no objection to the granting of this brief extension of time to file the responses. Mr. Gurdian asks that Thrifty Call serve its responses to AT&T on March 14, 2008 via email and regular mail. Thrifty Call agrees to do so.

Wherefore, Thrifty Call respectfully requests that the Commission grant until March 14, 2008 to file and serve its responses to AT&T's Third Set of Interrogatories (Nos. 51-71) and Third Request for Production of Documents (Nos. 23 &24).

Respectfully submitted,



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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 7 day of March, 2008:

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