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September 22, 2008

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

Re: **Docket No. 070368-TP (Nextel Partners)**  
**Docket No. 070369-TP (Nextel)**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Response to Nextel Partners' Motion for Extension of Time to Respond to AT&T Florida's Motion for Reconsideration, which we ask that you file in the captioned dockets.

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

Sincerely,

John T. Tyler

cc: All Parties of Record  
Gregory Follensbee  
E. Earl Edenfield, Jr.  
Lisa S. Foshee



time for Nextel to respond to AT&T's Motion For Reconsideration. AT&T advised Nextel that it would not consent to an extension.

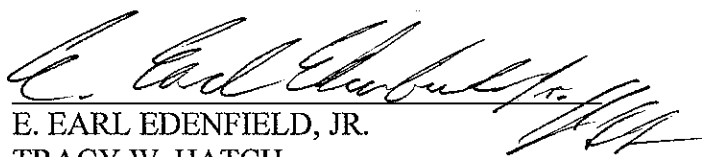
3. In its Motion for Extension of Time, counsel for Nextel contends "that AT&T advised that it did not believe that workload presented a sufficient reason for AT&T to consent to an extension of time."<sup>1</sup>

4. In actuality, counsel for AT&T notified Nextel that it could not agree to such an extension based solely upon Nextel's "pressing " workload—in this specific instance—in part because, throughout the course of this Docket, Nextel Partners has claimed "that AT&T's main objective is to delay and avoid adoption decisions..."<sup>2</sup>

5. In light of Nextel's contention that AT&T has sought in bad faith to delay the process, it behooves AT&T to demonstrate to the Commission that, as AT&T has asserted, AT&T is not attempting to delay the process and instead seeks to move the matter to conclusion consistent with the timetable established by the Commission Rules. Accordingly, AT&T defers to the Commission as to whether Nextel's workload alone provides an adequate basis for the Commission to grant, an extension.<sup>3</sup>

Respectfully submitted, this 22nd day of September, 2008.

BELLSOUTH TELECOMMUNICATIONS, INC.  
d/b/a AT&T FLORIDA

  
E. EARL EDENFIELD, JR.  
TRACY W. HATCH

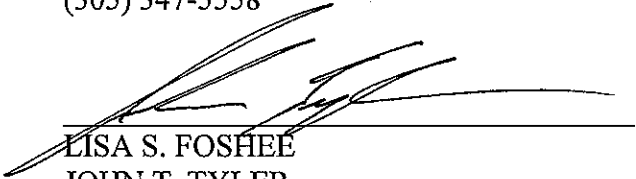
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<sup>1</sup> Motion for Extension of Time, at FN3.

<sup>2</sup> See Nextel's Motion for Leave to File Reply to AT&T's Response in Opposition to Motion for Summary Final Order and Supplementary Submissions Thereto, at 27.

<sup>3</sup> Furthermore, Nextel's note stating that AT&T was granted a second motion for extension of time, fails to place AT&T's requests within the proper context. See Nextel's Motion for Extension of Time, at FN3. As Nextel well knows, and as is memorialized in AT&T's First Motion for Extension of Time, AT&T sought extensions under circumstances in which the holiday season and the birth of a child to the attorney primarily responsible for handling the matter took place.

MANUEL A. GURDIAN  
c/o Gregory R. Follensbee  
150 South Monroe Street, Suite 400  
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(305) 347-5558

A handwritten signature in black ink, appearing to read 'LISA S. FOSHEE', is written over a horizontal line. The signature is stylized with several long, sweeping strokes.

LISA S. FOSHEE  
JOHN T. TYLER  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0757

#720726

**CERTIFICATE OF SERVICE**  
**Docket Nos. 070368-TP and 070369-TP**

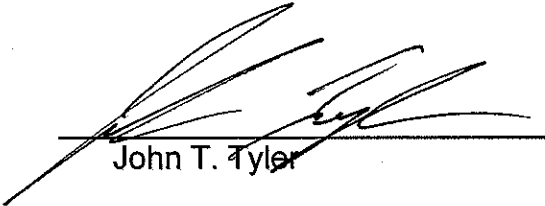
I HEREBY CERTIFY that a true and correct copy was served via Electronic Mail and First Class U. S. Mail this 22nd day of September, 2008 to the following:

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John T. Tyler