

Ruth Nettles

000121A-TP

From: Woods, Vickie [vf1979@att.com]
Sent: Monday, October 19, 2009 2:18 PM
To: Filings@psc.state.fl.us
Subject: 000121A-TP AT&T Florida and Cbeyond's Joint Motion to Stay Proceedings
Importance: High
Attachments: Document.pdf

- A. Vickie Woods
Legal Secretary to E. Earl Edenfield, Jr., Tracy W. Hatch,
and Manuel A. Gurdian
BellSouth Telecommunications, Inc. d/b/a AT&T Florida
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- B. Docket No. 000121A-TP: In Re: Investigation into the Establishment of Operations Support Systems Permanent Incumbent Local Exchange Telecommunications Companies.
- C. BellSouth Telecommunications, Inc.
on behalf of Manuel A. Gurdian
- D. 6 pages total in PDF format (Letter, Certificate of Service and Joint Motion)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Cbeyond Communications, LLC's Joint Motion to Stay Proceedings

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October 19, 2009

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

Re: Docket No. 000121A-TP
In Re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange Telecommunications companies (BellSouth Track)

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Cbeyond Communications, LLC's Joint Motion to Stay Proceedings, 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,

Manuel A. Gurdian

Enclosures

cc: All parties of record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.

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CERTIFICATE OF SERVICE
Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and U.S. Mail the 19th day of October, 2009 to the following:

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Manuel A. Gurdian

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies) Docket No. 000121A-TP
)
)
) Filed: October 19, 2009
/

**CBEYOND COMMUNICATIONS, LLC AND AT&T FLORIDA'S
JOINT MOTION TO STAY PROCEEDINGS**

Cbeyond Communications, LLC ("Cbeyond") and BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), by and through their undersigned counsel, file this Joint Motion to Stay Proceedings regarding Cbeyond's Complaint, Request for Stay of OSS Release and Request for Expedited Treatment ("Complaint") until the completion of the testing phase of AT&T Florida's 22-state LEX GUI ordering interface of AT&T Florida's OSS System, which began on October 12, 2009.

1. On October 9, 2009, Cbeyond filed its Complaint with the Florida Public Service Commission ("Commission") against AT&T Florida.

2. Cbeyond and AT&T Florida have engaged in various discussions and agree to the following:

- Cbeyond and AT&T Florida have agreed to request the Commission to stay Cbeyond's Complaint until the completion of the testing phase (which is currently expected to be completed November 9, 2009) of AT&T Florida's 22-state LEX GUI ordering interface of AT&T Florida's OSS System, which began on October 12, 2009. After completion of the testing, Cbeyond will advise AT&T Florida whether Cbeyond intends to

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move forward on the Complaint, and, if so, AT&T Florida will have fifteen (15) days from such notification to file its response.

- AT&T Florida has agreed to maintain operational its LENS ordering interface until at least March 22, 2010.
- If CLECs involved in the testing continue to have complaints upon conclusion of the testing, AT&T Florida will agree for Commission Staff to audit the specific complaints surrounding the 22-state LEX GUI ordering interface.

3. Accordingly, based upon the foregoing, AT&T Florida and Cbeyond request that the Commission enter an Order staying further proceedings regarding this Complaint until the testing phase of the 22-state LEX GUI ordering interface is completed (which is currently expected to be completed November 9, 2009).

4. The granting of this Joint Motion will allow the Commission to conserve its valuable resources and will not prejudice any party.


WHEREFORE, Cbeyond and AT&T Florida, respectfully request that the Commission enter an Order granting their Joint Motion to Stay Proceedings.

AT&T FLORIDA



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Cbeyond Communications, LLC

 by express written
permission for

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