## **Ruth Nettles**

From:	Woods, Vickie [vf1979@att.com]	
Sent:	Monday, January 14, 2008 2:11 PM	
То:	Filings@psc.state.fl.us	
Subject:	070368/070369-TP AT&T Florida's Second Motion for Extension of Time	
Importance:	High	
Attachments: 070368_0.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 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (305) 347-5560 vf1979@att.com

B. Re: <u>Docket No. 070368-TP</u>: Notice of the Adoption by NPCR, Inc. d/b/a Nextel Partners of the Existing "Interconnection Agreement By and Between BellSouth Telecommunications, Inc. and Sprint Communications Company Limited Partnership, Sprint Communications Company L.P., Sprint Spectrum L.P., dated January 1, 2001

Re: Docket No. 070369-TP: Notice of the Adoption by Nextel South Corp. and Nextel

West Corp. (collectively "Nextel") of the Existing "Interconnection Agreement By and Between BellSouth Telecommunications, Inc. and Sprint Communications Company Limited Partnership, Sprint Communications Company L.P., Sprint Spectrum L.P." dated January 1, 2001

C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida

on behalf of Manuel A. Gurdian

- D. 4 pages total (includes letter, certificate of service and pleading)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Second Motion for Extension of Time

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00345 JAN 148

FPSC-COMMISSION CLERK



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January 14, 2008

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

> Re: <u>Docket No. 070368-TP</u>: Notice of the Adoption by NPCR, Inc. d/b/a Nextel Partners of the Existing "Interconnection Agreement By and Between BellSouth Telecommunications, Inc. and Sprint Communications Company Limited Partnership, Sprint Communications Company L.P., Sprint Spectrum L.P." dated January 1, 2001

Re: <u>Docket No. 070369-TP</u>: Notice of the Adoption by Nextel South Corp. and Nextel West Corp. (collectively "Nextel") of the Existing "Interconnection Agreement By and Between BellSouth Telecommunications, Inc. and Sprint Communications Company Limited Partnership, Sprint Communications Company L.P., Sprint Spectrum L.P." dated January 1, 2001

Dear Ms. Cole:

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

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

Sincerely. Gurdian

cc: All parties of record Gregory Follensbee E. Earl Edenfield, Jr. Lisa S. Foshee

00345 JAN 148

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLERK

## 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 14<sup>th</sup> day of January, 2008 to the following:

Florida Public Service Commission Adam Teitzman, Staff Counsel Victor McKay, Staff Counsel 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 <u>ateitzma@psc.state.fl.us</u> <u>vmckay@psc.state.fl.us</u>

Marsha E. Rule Rutledge Law Firm 215 South Monroe Street, Suite 420 (32301) P.O. Box 551 Tallahassee, Florida 32302-0551 Tel. No. (850) 681-6788 Fax. No. (850) 681 -6515 marsha@reuphlaw.com

Douglas C. Nelson William R. Atkinson Sprint Communications/Sprint Nextel 233 Peachtree Street, N.E, Suite 2200 Atlanta, GA 30303-1504 Tel. No. (404) 649-0003 Fax. No. (404) 649-0009 douglas.c.nelson@sprint.com bill.atkinson@sprint.com

Joseph M. Chiarelli Sprint Nextel 6450 Sprint Parkway Overland Park, KS 66251 Tel. No. (91 3) 315-9223 Fax. No. (913) 523-9623 joe.m.chiarelli@sprint.com

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

Notice of the Adoption by NPCR, Inc. d/b/a Nextel Partners of the Existing "Interconnection Agreement By and Between BellSouth Telecommunications, Inc. and Sprint Communications Company Limited Partnership, Sprint Communications Company L.P., Sprint Spectrum L.P." dated January 1, 2001	) Docket No. 070368-TP ) ) ) )
Notice of the Adoption by Nextel South Corp. And Nextel West Corp. (collectively "Nextel") Of the Existing "Interconnection Agreement By and Between BellSouth Telecommunications, Inc. and Sprint Communications Company Limited Partnership, Sprint Communications Company L.P., Sprint Spectrum L.P." dated January 1, 2001	) ) Docket No. 070369-TP ) ) ) )
	) Filed: January 14, 2008

## AT&T FLORIDA'S SECOND MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") asks the Florida Public Service Commission ("Commission") for a second extension of time in which to file its responses to the Motion for Summary Final Order, Motion to Quash Notice of Deposition and For Protective Order ("Motions") and Request for Oral Argument on the Motions filed by NPCR, Inc. d/b/a Nextel Partners, Nextel South Corp. and Nextel West Corp. (collectively referred to as "Nextel"). In support of this Motion, AT&T Florida states the following:

1. On or about December 26, 2007, Nextel filed its Motions.

2. On or about January 3, 2008, AT&T Florida filed a Motion for Extension of Time seeking through and including January 14, 2008 to file responses to the Motions.

3. AT&T Florida requires more time to properly prepare appropriate responses to the Motions.

0000MENT NUMBER-DATE 00345 JAN 148 FPSC-COMMISSION CLERK 4. AT&T Florida now seeks through and including January 21, 2008 to file responses to the Motions.

5. No party would be negatively impacted by the Commission granting AT&T Florida's requested extension. Further, there is no procedural schedule in place to be impacted.

6. AT&T Florida contacted the parties to this action and Nextel's counsel consented to the extension.

WHEREFORE, for the foregoing reasons, AT&T Florida respectfully requests an extension of time through and including January 21, 2008 in which to file its responses to the Motions.

Respectfully submitted this 14th day of January, 2008.

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

E. EARL EDENFIELD, JR.. TRACY W. HATCH MANUEL A. GURDIAN c/o Gregory R. Follensbee 150 South Monroe Street, Suite 400 Tallahassee, FL 32301 (305) 347-5558

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