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> > May 27, 2008

Ms. Ann Cole, Director **Commission Clerk and Administrative Services** Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

> Docket No. 070408-TP Re:

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket on behalf of Level 3 Communications, LLC ("Level 3") and Neutral Tandem, Inc. and Neutral Tandem-Florida, LLC ("Neutral Tandem") are the original and fifteen copies of a Joint Motion for Extension of Time for Filing of All Prefiled Testimony and Exhibits.

Please acknowledge receipt of these documents by stamping the extra copy of this letter filed and returning the copy to me. Thank you for your assistance with this filing.

KAH/rl Enclosures All Parties of Record cc: CC: All 1 article of 1000 level3\neutraltandem\cole may 27 08ltr الار الدي الدينية الدينية الدينية المالية 7.0A 308 STA . SEC OTH Marguerite (5)

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DOCUMENT NUMBER-DATE 04478 MAY 27 8 **FPSC-COMMISSION CLERK**

Sincerely.



R. DAVID PRESCOTT

MARSHA E. RULE

GARY R. RUTLEDGE

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GOVERNMENTAL CONSULTANTS JONATHAN M. COSTELLO MARGARET A. MENDUNI

HAROLD F. X. PURNELL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Neutral Tandem, Inc. and)Neutral Tandem-Florida, LLC for)Resolution of Interconnection Dispute with)Level 3 Communications, LLC, and)Request for Expedited Resolution.)

Docket No. 070408-TP

Filed: May 27, 2008

JOINT MOTION FOR EXTENSION OF TIME FOR FILING OF ALL PREFILED TESTIMONY AND EXHIBITS

Neutral Tandem, Inc. and Neutral Tandem-Florida, LLC ("Neutral Tandem"), and Level 3 Communications, LLC ("Level 3"), by and through their respective undersigned counsel, and pursuant to Rule 28-106.204, Florida Administrative Code, hereby jointly request the Prehearing Officer to grant a two week extension with respect to the current controlling dates for the filing of all prefiled testimony and exhibits in this proceeding. In support of this Joint Motion, Neutral Tandem and Level 3 state as follows:

1. On March 18, 2008, the Prehearing Officer issued Order No. PSC-08-0159-PCO-

TP (Order Establishing Procedure) establishing the following dates for the filing of prefiled testimony and exhibits:

Direct Testimony and Exhibits	June 2, 2008
Rebuttal Testimony and exhibits	June 30, 2008
Surrebuttal Testimony and Exhibits	July 21, 2008

2. The parties believe that additional time is necessary for the full preparation and presentation of the testimony and exhibits addressing the issues in this proceeding. The parties

DOCUMENT NUMBER-CATE 04478 MAY 27 8 FPSC-COMMISSION CLERK are not requesting any change to the current controlling date for the filing of prehearing statements or for the dates established for the Prehearing Conference¹ and Final Hearing.

3. Based on the above, the parties request that the following new dates be established as controlling dates for the filing of prefiled testimony and exhibits in this proceeding:

Direct Testimony and Exhibits	June 16, 2008
Rebuttal Testimony and Exhibits	July 14, 2008
Surrebuttal Testimony and Exhibits	August 4, 2008

WHEREFORE, for the foregoing reasons, Neutral Tandem and Level 3 respectfully request that the Prehearing Officer grant this Motion and enter an Order establishing new controlling dates for the filing and service of prefiled testimony and exhibits in this proceeding as outlined in paragraph 3 above.

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Christopher M. Kise, Esq. <u>ckise@foley.com</u> Foley & Lardner, LLP 106 East College Avenue Suite 900 Tallahassee, Florida 32301 (850) 513-3367 Respectfully submitted,

Kenneth A. Hoffman, Esq. <u>Ken@reuphlaw.com</u> Martin P. McDonnell, Esq. <u>Marty@reuphlaw.com</u> Rutledge, Ecenia, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, Florida 32302 (850) 681-6788 (Telephone) (850) 681-6515 (Telecopier)

- - and - -

¹ The date for the Prehearing Conference was initially established in the <u>Order Establishing</u>. <u>Procedure</u> and subsequently modified in the <u>First Order Modifying Procedure</u>, Order No. PSC-08-0173-PCO-TP issued March 21, 2008. - - and - -

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Attorneys for Neutral Tandem, Inc. and Neutral Tandem-Florida, LLC

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Attorneys for Level 3 Communications, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by Electronic Mail on May 27, 2008 to the following:

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