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September 12, 2005

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: D.T.E. 04-33 - Petition of Verizon New England Inc. for Arbitration

Dear Ms. Cottrell:

Enclosed is a Joint Motion for Extension of Time that is being filed on behalf of Verizon New England Inc., AT&T Communications of New England, Inc., the Competitive Carrier Coalition, and the Competitive Carrier Group, and Conversent Communications of Massachusetts, Inc.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Moore", written over a horizontal line.

Alexander W. Moore

cc: Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Petition of Verizon New England Inc. for)
Arbitration of an Amendment to Interconnection)
Agreements with Competitive Local Exchange)
Carriers and Commercial Mobile Radio Service) D.T.E. 04-33
Providers in Massachusetts Pursuant to Section)
252 of the Communications Act of 1934, as)
Amended, and the *Triennial Review Order*)

JOINT MOTION FOR EXTENSION OF TIME

Verizon New England Inc., d/b/a Verizon Massachusetts, AT&T Communications of New England, Inc., the Competitive Carrier Coalition,¹ the Competitive Carrier Group,² and Conversent Communications of Massachusetts, Inc. (the “Parties”) hereby respectfully request that the Massachusetts Department of Telecommunications and Energy (the “Department”) grant a further extension of time, until October 5, 2005, to file a final Amendment incorporating the determinations made in the Arbitration Order issued by the Department on July 14, 2005 in the above-captioned proceeding.³

¹ The Competitive Carrier Coalition includes: CTC Communications Corp.; DSLNet Communications, LLC; Focal Communications Corporation of Massachusetts, Lightship Telecom, LLC; RCN-BecoCom LLC; and RCN Telecom Services of Massachusetts, Inc.

² The Competitive Carrier Group includes: A.R.C. Networks Inc. d/b/a InfoHighway Communications Corporation; Broadview Networks Inc. and Broadview NP Acquisition Corp.; Cleartel Telecommunications, Inc. f/k/a Essex Acquisition Corp.; DIECA Communications Inc. d/b/a Covad Communications Company; DSCI Corp., IDT America Corp.; KMC Telecom V, Inc.; and XO Communications Services, Inc. (formerly XO Massachusetts, Inc. and Allegiance Telecom of Massachusetts, Inc.).

³ Arbitration Order in D.T.E. 04-33 (rel. Jul. 14, 2005).

Good cause exists for granting this extension.⁴ Under the terms of the Arbitration Order, which directed the Parties to file a final Amendment within 30 days of its issuance, a conforming Amendment was due on August 15, 2005. The Department subsequently granted the Parties an extension to September 14 to file an Amendment. The Parties have exchanged drafts of an Amendment and have held several negotiating sessions in an effort to develop a final Amendment that fully and properly reflects the Department's determinations in the Arbitration Order. Although the Parties have made progress, additional discussions are necessary if they are to resolve a number of remaining issues. The Parties believe that they may be able through further discussion to narrow the number of issues on which they cannot agree, and they have already scheduled additional negotiation sessions. Providing for a further extension as requested herein so that those discussions can continue may thus serve to limit the issues the Department may ultimately have to resolve. The brief extension is, therefore, in the Parties' (and the Department's) best interest, as it more efficiently achieves the Department's objective of having a conforming Amendment. Indeed, a filing at this time will only precipitate more litigation, whereas issues may be narrowed if the Parties have additional time to negotiate a conforming Amendment.

⁴ 220 C.M.R. ¶ 1.02(5) (For good cause shown, the Department or the hearing officer has discretion to extend time limits prescribed or allowed by its Procedural Rules).

WHEREFORE, the Parties respectfully request that the Department grant this Joint Motion for Extension of Time and find that good cause exists for doing so.

Respectfully submitted,



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Dated: September 12, 2005

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