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December 19, 2008

VIA ELECTRONIC FILING

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 080134-TP

Dear Ms. Cole:

Enclosed for filing on behalf of Intrado Communications Inc. is an electronic version of the following document: Intrado Communications Inc. Motion to Hold in Abeyance.

Thank you for your assistance with this filing.

Sincerely yours,


Floyd R. Self

FRS/amb

Enclosures

cc: Rebecca Ballesteros, Esq.
Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)	
In the Matter of the Petition)	
of Intrado Communications Inc. for Arbitration)	Docket No. 080134-TP
Pursuant to Section 252(b) of the Communications Act)	Filed: December 19, 2008
of 1934, as amended, and Section 364.162, Florida)	
Statutes, to Establish an Interconnection Agreement with)	
Verizon Florida LLC)	
)	

INTRADO COMMUNICATIONS INC. MOTION TO HOLD IN ABEYANCE

Intrado Communications Inc. (“Intrado Comm”), by its attorneys, hereby respectfully submits this Motion to Hold in Abeyance the above-referenced arbitration proceeding between Intrado Comm and Verizon Florida LLC (“Verizon”). Intrado Comm respectfully requests that the Commission hold this proceeding in abeyance effective immediately pending the resolution of the petitions for reconsideration filed by Intrado Comm in the arbitration proceedings between Intrado Comm and AT&T (Docket No. 070736) and Intrado Comm and Embarq (Docket No. 070699). In addition, Intrado Comm requests expedited review of this Motion given the pending procedural schedule requiring the Parties to file direct testimony on Monday, December 22, 2008.

In support of this Motion, Intrado Comm states as follows:

1. On December 16, 2008, Verizon filed a Motion for Summary Final Order, which was served on the parties to this proceeding via U.S. Mail according to the certificate of service. To date, Intrado Comm’s three listed attorneys have not received Verizon’s Motion via U.S. Mail. Intrado Comm only learned of Verizon’s Motion during a routine check of the Commission’s website on December 18, 2008.

2. In its Motion, Verizon asks the Commission to issue a Summary Final Order in the arbitration proceeding between Intrado Comm and Verizon based on the Commission's December 3, 2008 orders in the arbitration proceedings between Intrado Comm and AT&T (Docket No. 070736) and Intrado Comm and Embarq (Docket No. 070699). Verizon claims that a Summary Final Order is appropriate because there is no genuine issue as to any material fact in the instant proceeding.

3. On December 18, 2008, Intrado Comm filed petitions for reconsideration of the Commission's December 3, 2008 orders in the arbitration proceedings between Intrado Comm and AT&T (Docket No. 070736) and Intrado Comm and Embarq (Docket No. 070699).

4. Intrado Comm disagrees with substance of Verizon's Motion and will respond accordingly once the abeyance period ends. There is no issue of whether Intrado Comm offers telephone exchange service in the Intrado Comm-Verizon arbitration proceeding. Moreover, the resolution of Verizon's Motion is necessarily dependent on the outcome of the Commission's review of Intrado Comm's petitions for reconsideration in the AT&T and Embarq dockets. Verizon's Motion appears to be based entirely on the findings made by the Commission in those dockets.

5. A complete abeyance of the Intrado Comm-Verizon arbitration proceeding, including Intrado Comm's response to Verizon's Motion, would therefore serve the public interest and conserve the resources of both the Commission and the parties while the Commission reviews Intrado Comm's petitions for reconsideration. Intrado Comm would be prepared to file its response to Verizon's Motion within seven (7) days after the Commission rules on the Embarq and AT&T petitions for reconsideration.

6. Verizon has indicated its agreement to hold the procedural schedule of the Intrado Comm-Verizon arbitration proceeding in abeyance pending the Commission's decision on Verizon's Motion, but not pending the Commission's decision on the petitions for reconsideration in the Embarq and AT&T dockets.

7. Verizon's limited abeyance is not feasible given that the Commission must logically rule on the petitions for reconsideration before it can rule on Verizon's Motion.

8. Accordingly, Intrado Comm respectfully requests that the Commission hold the Intrado Comm-Verizon arbitration proceeding in abeyance effective immediately, which would stay the filing of Intrado Comm's response to Verizon's Motion as well as the procedural dates set forth in the November 12, 2008 Prehearing Order issued in the instant proceeding.

9. Intrado Comm also respectfully requests expedited action on this Motion given the pending deadline to file direct testimony on Monday, December 22.

Respectfully submitted,

INTRADO COMMUNICATIONS INC.



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Dated: December 19, 2008

Its Attorneys

CERTIFICATE OF SERVICE

I, Angela F. Collins, hereby certify that copies of the foregoing Motion to Hold in Abeyance were sent via electronic mail and U.S. mail on December 19, 2008 to the following:

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