Ruth Nettles

090501-TP

From:

Scobie, Teresa A (TERRY) [terry.scobie@verizon.com]

Sent:

Thursday, March 11, 2010 4:07 PM

To:

Filings@psc.state.fl.us

Cc:

Adam Teitzman; App, Frank (FRANK); Beth Keating; Beth Salak; Carnell, William Sayle; Kimberly Caswell; Chris Savage; David Christian; Clark, Demetria Germaine; Danielle Frappier; Jamie Morrow; Marva Johnson;

O'Roark, Dulaney L

Subject:

Docket No. 090501-TP - Joint Motion for Extension of Time

Attachments: 090501 VZ FL-BH Joint Motion for Extension 3-11-10.pdf



The attached is submitted for filing in Docket No. 090501-TP on behalf of Verizon Florida LLC and Bright House Networks by

Dulaney L. O'Roark III P. O. Box 110, MC FLTC0007 Tampa, Florida 33601-0110 (770) 284-3620 de.oroark@verizon.com

The attached document consists of a total of four pages - cover letter (1 page), Joint Motion (2 pages), and Certificate of Service (1 page).

Terry Scobie
Legal Secretary II
Verizon Legal Department
P. O. Box 110 - MC FLTC0007
Tampa, Florida 33601-0110
813-483-2610 (tel)
813-204-8870 (fax)
terry.scobie@verizon.com

DOCUMENT NUMBER-EATH

Dulaney L. O'Roark IIIVice President & General Counsel, Southeast Region Legal Department



Six Concourse Parkway Suite 800 Atlanta, Georgia 30328

Phone 770-284-3620 Fax 770-284-3008 de.oroark@verizon.com

March 11, 2010 - VIA ELECTRONIC MAIL

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

Re: Docket No. 090501-TP

Petition for arbitration of certain terms and conditions of an interconnection agreement with Verizon Florida LLC by Bright House Networks Information Services (Florida), LLC

Dear Ms. Cole:

Enclosed for filing in the above matter is a Joint Motion for Extension of Time. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (770) 284-3620.

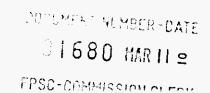
Sincerely,

s/Dulaney L. O'Roark III

Dulaney L. O'Roark III

tas

Enclosures



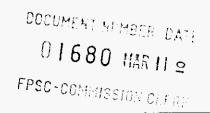
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of certain terms and) Docket No. 090501-TP
conditions of an interconnection agreement with)
Verizon Florida LLC by Bright House Networks) Filed: March 11, 2010
Information Services (Florida), LLC)
)

JOINT MOTION FOR EXTENSION OF TIME

Verizon Florida LLC and Bright House Networks Information Services (Florida), LLC (collectively, the "Parties") file this joint motion requesting that the filing date for direct testimony and exhibits be extended from March 12, 2010 to March 26, 2010 and that the filing date for rebuttal testimony and exhibits be extended from April 16, 2010 to April 23, 2010. In support of this joint motion, the Parties show the following:

- 1. The Parties have agreed in principle to settle certain key issues in this case and are in the process of memorializing that agreement. The Parties also plan to negotiate concerning the resolution of additional issues over the next two weeks and it is their hope that as a result the scope of this case will be reduced even further.
- 2. The Parties are requesting relatively short extensions of time for the filing of direct and rebuttal testimony and exhibits so they can focus on memorializing their agreement and resolving additional issues. Allowing additional time so the parties can complete these discussions will promote administrative efficiency by reducing the number of issues on which testimony and other evidence may be necessary.
- 3. The requested extension will not affect any of the other dates set out in the Order Establishing Procedure in this docket.



WHEREFORE, the Parties respectfully request the Commission to approve their request to extend the filing date for direct testimony and exhibits to March 26, 2010 and to extend the filing date for rebuttal testimony and exhibits to April 23, 2010.

Respectfully submitted on March 11, 2010.

VERIZON FLORIDA LLC

BRIGHT HOUSE NETWORKS INFORMATION SERVICES (FLORIDA), LLC

s/ Dulaney L. O'Roark III
Dulaney L. O'Roark III
Post Office Box 110
MC FLTC0007
Tampa, FL 33601-0110

s/ Beth Keating
Beth Keating
Akerman Senterfitt
106 East College Avenue, Suite 1200
Tallahassee, FL 32301

Attorney for Verizon Florida LLC

Attorney for Bright House Networks Information Services (Florida), LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on March 11, 2010 to:

Adam Teitzman, Staff Counsel Jamie L. Morrow, Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ateitzma@psc.state.fl.us jmorrow@psc.state.fl.us

Beth Salak
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
bsalak@psc.state.fl.us

Christopher W. Savage
Davis, Wright Tremaine, LLP
1919 Pennsylvania Avenue NW, Suite 200
Washington, DC 20006
chrissavage@dwt.com

Beth Keating
Akerman Senterfitt
Highpoint Center, 12th floor
106 East College Avenue
Tallahassee, FL 32301
beth.keating@akerman.com

Marva B. Johnson
Bright House Networks
301 E. Pine Street, Suite 600
Orlando, FL 32801
marva.johnson@mybrighthouse.com

s/Dulaney L. O'Roark III