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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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COMMISSION  
CLERK

FLORIDA CABLE  
TELECOMMUNICATIONS ASSOCIATION,  
INC., COX COMMUNICATIONS GULF  
COAST, L.L.C., et. al.

E.B. Docket No. 04-381

Complainants,

v.

GULF POWER COMPANY,

Respondent.

To: Office of the Secretary

Attn.: The Honorable Richard L. Sippel  
Chief Administrative Law Judge

**MOTION TO EXTEND DEADLINE TO RESPOND TO  
COMPLAINANTS' SECOND SET OF REQUESTS FOR PRODUCTION**

Gulf Power Company ("Gulf Power"), pursuant to 47 C.F.R. § 1.205,  
respectfully requests that the Presiding Judge enter an order extending Gulf Power's deadline to

CMP \_\_\_\_\_ respond to complainants' Second Set of Requests for Production to Friday, August 26, 2005. In

COM \_\_\_\_\_ support of this motion, Gulf Power says the following:

CTR \_\_\_\_\_

ECR \_\_\_\_\_

GCL \_\_\_\_\_

OPC \_\_\_\_\_

RCA \_\_\_\_\_

SCR \_\_\_\_\_

SGA \_\_\_\_\_

SEC \_\_\_\_\_

OTH \_\_\_\_\_

1. The Presiding Judge released a Discovery Order on August 5, 2005. The  
Discovery Order does not require further production of documents by Gulf Power. Instead, the  
order provides:

Complainants consider the case to be now ripe for motion to  
dismiss on the law without a hearing, which seems to negate a  
need for further document discovery of the scope undertaken by  
Complainants.

DOCUMENT NUMBER-DATE

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\* \* \* \*

In view of the extensive document discovery made since 2000, production of documents at this point should be limited to documents which are reasonably expected to be used in depositions or in cross-examination of key witnesses, and which have not already been produced.

(August 4, 2005 Discovery Order, p. 20).

2. On August 10, 2005, complainants served their second set of document requests, which contain 17 separate requests. Under the FCC's procedural rules, responses to such requests are due within 10 days of service. 47 C.F.R. § 1.325(2). This would make the deadline Monday, August 22, 2005.

3. Gulf Power cannot adequately respond to these 17 requests by Monday, August 22, 2005.<sup>1</sup> Complainants do not object to extending this deadline to Friday, August 26, 2005, which is the same deadline set by the August 4, 2005 Discovery Order for Gulf Power to supplement certain interrogatory responses.

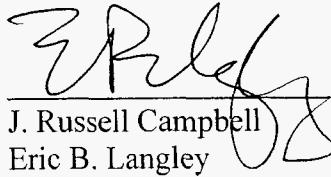
4. No party will be prejudiced by this short extension, and the extension will not affect the other deadlines established by the Presiding Judge.

5. Gulf Power respectfully requests an order extending Gulf Power's deadline to respond to complainants' Second Set of Requests for Production to Friday, August 26, 2005

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<sup>1</sup> Though a short turn-around time frame under any circumstances, part of the reason Gulf Power cannot adequately respond by Monday, August 22 is that undersigned counsel was out of the office August 10-15 with a new baby.

Respectfully submitted,



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J. Russell Campbell

Eric B. Langley

**BALCH & BINGHAM, LLP**

1710 Sixth Avenue North

Birmingham, Alabama 35203-2015

Telephone: (205) 251-8100

Facsimile: (205) 226-8798

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Ralph A. Peterson

**BEGGS & LANE, LLP**

P.O. Box 12950

Pensacola, Florida 32591-2950

Telephone (850) 432-2451

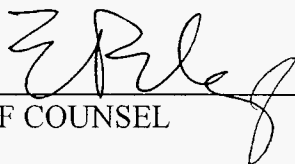
Facsimile: (850) 469-3331

**Counsel for Respondent**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion has been served upon the following by Electronic Mail and by United States Mail on this the 19<sup>th</sup> day of August, 2005:

<p>Lisa Griffin Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 <b>Via E-mail</b></p>	<p>Shiela Parker Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 <b>Via E-mail</b></p>
<p>Rhonda Lien Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 <b>Via E-mail</b></p>	<p>Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, D.C. 20554</p>
<p>James Shook Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 <b>Via E-mail</b></p>	<p>David H. Solomon Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554</p>
<p>Director, Division of Record and Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850</p>	<p>Federal Energy Regulatory Commission Docket Room 1A-209 888 First Street, NE Washington, D.C. 20426</p>
<p>John D. Seiver COLE, RAYWID &amp; BRAVERMAN 1919 Pennsylvania Avenue, N.W. Suite 200 Washington, D.C. 20006 <b>Via E-mail</b></p>	

  
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 OF COUNSEL