

Kimberley Pena

From: Ann Bassett [abassett@lawfla.com]
Sent: Tuesday, July 01, 2008 11:45 AM
To: Filings@psc.state.fl.us
Subject: Docket Nos. 070691-TP and 080036-TP
Attachments: 2008-07-01, 070691 080036, Joint Motion for Extension of Time for Rebuttal Testimony, Prehearing Statements and discovery.pdf

The person responsible for this electronic filing is:

Floyd R. Self
Messer, Caparello & Self, P.A.
P.O. Box 15579
Tallahassee, FL 32317
(850) 222-0720
fself@lawfla.com

The Docket Nos are:

070691-TP - Complaint and request for emergency relief against Verizon Florida, LLC for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Bright House Networks Information Services (Florida), LLC, and its affiliate, Bright House Networks, LLC

080036-TP - Complaint and request for emergency relief against Verizon Florida, L.L.C. for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone.

This is being filed on behalf of Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone; Bright House Networks Information Services (Florida) LLC, and Verizon Florida LLC (collectively, "the Parties")

Total Number of Pages is 5.

Joint Motion for Extension of time for Rebuttal Testimony, Prehearing Statements and Discovery

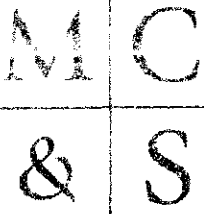
Ann Bassett
Messer, Caparello & Self, P.A.
2618 Centennial Place (32308)
P.O. Box 15579
Tallahassee, FL 32317
Direct Phone: 850-201-5225
Fax No. 850-224-4359
Email Address: <abassett@lawfla.com>
Web Address: <www.lawfla.com>

DOCUMENT NUMBER - DATE

05699 JUL -1 8

FPSC-COMMISSION CLERK

7/1/2008



MESSER CAPARELLO & SELF, P.A.

Attorneys At Law

www.lawfla.com

July 1, 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

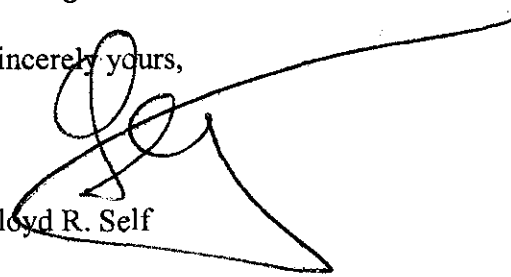
Re: Docket Nos. 070691-TP and 080036-TP

Dear Ms. Cole:

Enclosed for filing on behalf of Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone, Bright House Networks Information Services (Florida) LLC, and Verizon Florida LLC (collectively "the Parties") is an electronic version of a Joint Motion for Extension of Time for Rebuttal Testimony, Prehearing Statements and Discovery in the above referenced dockets.

Thank you for your assistance with this filing.

Sincerely yours,


Floyd R. Self

FRS/amb
Enclosure
cc: Parties of Record

DOCUMENT NUMBER-DATE

Regional Center Office Park / 2618 Centennial Place / Tallahassee, Florida 32310
Mailing Address: P.O. Box 15579 / Tallahassee, Florida 32317
Main Telephone: (850) 222-0720 / Fax: (850) 224-4359

05899 JUL -1 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and request for emergency relief against Verizon Florida, LLC for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Bright House Networks Information Services (Florida), LLC, and its affiliate, Bright House Networks, LLC.

Docket No. 070691-TP

In re: Complaint and request for emergency relief against Verizon Florida, L.L.C. for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone.

Docket No. 080036-TP

Filed: July 1, 2008

**JOINT MOTION FOR EXTENSION OF TIME FOR
REBUTTAL TESTIMONY, PREHEARING STATEMENTS AND DISCOVERY**

Bright House Networks Information Services (Florida) LLC, and Bright House Networks, LLC (together, "Bright House"), Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone ("Comcast"), and Verizon Florida LLC, ("Verizon") (hereinafter, collectively "the Parties") pursuant to Rule 28-106.204, Florida Administrative Code, hereby move the Florida Public Service Commission ("Commission") to extend the time rebuttal testimony is due by three weeks to Friday, July 25, 2008; to extend the time for prehearing statements two weeks to Friday, July 25, 2008; and to extend the close of discovery one week to Thursday, August 21, 2008 and as grounds therefore, the Parties state:

1. By Order No. PSC-08-0235-PCO-TL (Order Establishing Procedure), issued April 10, 2008, certain controlling dates for filing testimony for this consolidated Docket were established. By Order No. PSC-08-0325-PCO-TP (Order Modifying Procedure), the dates set for filing Direct and Rebuttal Testimony were extended, with Rebuttal Testimony being scheduled to

DOCUMENT NUMBER-DATE

05699 JUL -1 8

FPSC-COMMISSION CLERK

be filed on Thursday, July 3, 2008. In addition, prehearing statements are due on July 11, 2008 and discovery is scheduled to close on August 14, 2008.

2. The Parties believe it would be appropriate to extend the due date for rebuttal testimony and the prehearing statements to July 25, 2008 and to extend the close of discovery to August 21, 2008. In view of summer vacation schedules, the upcoming holiday, and other pending matters, the Parties believe that these extensions would better enable the Parties to properly prepare their rebuttal testimony and prehearing statements and to complete discovery.

3. The Parties believe that the requested extensions will not affect the hearing dates or any other activities scheduled for the docket and will still provide sufficient time for any necessary discovery prior to the August 28 and 29 hearings.

WHEREFORE, Bright House, Comcast, and Verizon respectfully request that Order No. PSC-08-0325-PCO-TP be amended to extend the deadline for submission of rebuttal testimony and prehearing statements through the close of business on Friday, July 25, 2008 and to extend the discovery period to Thursday, August 21, 2008.

Respectfully submitted,

Chris Savage by permission

Christopher W. Savage
Davis Wright Tremaine, LLP
1919 Pennsylvania Avenue, NW, Suite 200
Washington, D.C. 20006
Tel: 202-973-4200
Fax: 202-973-4499
chrissavage@dwt.com

Counsel for Bright House Network

S. Cullari by permission

Samuel F. Cullari, Counsel
Comcast Cable
1500 Market Street
Philadelphia, PA 19102
Tel: 215-286-8097
Fax: 215-286-5039
samuel_cullari@comcast.com

Counsel for Comcast Cable

P. O'Roark by permission

Dulaney L. O'Roark III
5055 North Point Parkway
Alpharetta, Georgia 30022
Tel: 678-259-1449
Fax: 678-259-1589
de-oroark@verizon.com

Attorney for Verizon Florida LLC

Beth Keating by permission

Beth Keating
Akerman Senterfitt
106 East College Avenue., Suite 1200
Tallahassee, FL 32301
Tel: 850-521-8002
Fax: 850-222-01-3
beth.keating@akerman.com

Counsel for Bright House Network

Floyd R. Self

Floyd R. Self
Messer, Caparello & Self, P.A.
P.O. Box 15579
Tallahassee, FL 32317
Tel: 850-222-0720
Fax: 850-224-4359
fself@lawfla.com

Counsel for Comcast Cable

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been served by Electronic Mail (*) and/or U. S. Mail this 1st day of July, 2008 upon the following:

Charlene Poblete, Esq.*
H. F. Mann, Esq.*
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Mr. David Christian*
Verizon Florida LLC
106 East College Avenue, Suite 710
Tallahassee, FL 32301

Beth Keating, Esq.*
Akerman Senterfitt Law Firm
106 East College Avenue, Suite 1200
Tallahassee, FL 32302-1877

Marva Brown Johnson, Esq.*
Bright House Networks Information
Services, LLC
12985 North Telecom Parkway
Temple Terrace, FL 33637-0907

Christopher W. Savage, Esq.*
Davis Wright Tremaine, LLP
1919 Pennsylvania Avenue, NW, Suite 20
Washington, DC 20006

Dulaney L. O'Roark III, Esq.*
Verizon Florida LLC
5055 North Point Parkway
Alpharetta, GA 30022

Christopher McDonald, Esq.*
Comcast Phone of Florida, LLC d/b/a
Comcast Digital Phone
300 West Pensacola Street
Tallahassee, FL 32301-1618

Samuel F. Cullari, Counsel*
Comcast Cable
1500 Market Street
Philadelphia, PA 19102

David A. Konuch, Esq.*
Florida Cable Telecommunications
Association, Inc. (interested)
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Howard E. Adams, Esq.
Pennington Law Firm (interested)
Post Office Box 10095
Tallahassee, FL 32302-2095

Ms. Carolyn Ridley
Time Warner Telecom (interested)
555 Church Street, Suite 2300
Nashville, TN 37219


FLOYD R. SELF