Dorothy Menasco

From:

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Sent:

Wednesday, November 23, 2011 1:22 PM

To:

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Cc:

'Savage, Christopher'; 'Dodge, John'; Johnson, Marva B. (Marva.Johnson@mybrighthouse.com); 'O'Roark, Dulaney L'; 'david.christian@verizon.com'; Beth Salak; Adam Teitzman; Martha Brown; Larry Harris; 'Caswell,

Kimberly (Kim)'

Subject:

Docket No. 110056-TP

Attachments: 20111123131124764.pdf

Attached for filing in the docket referenced, is a copy of Bright House's Motion for Extension of Time to File Rebuttal Testimony. If you have any questions, please contact me at the number below. Thank you.

Person Responsible for Filing:

Beth Keating Gunster Law Firm 215 South Monroe Street, Suite 601 Tallahassee, FL 32301

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Docket Name and Number: Docket No. 110056-TP – Complaint against Verizon Florida LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service, by Bright House Networks Information Services (Florida), LLC

Filed on Behalf of: Bright House Networks Information Services (Florida), LLC

Total Number of Pages: 4

Description of Documents: Motion for Extension of Time to File Rebuttal Testimony



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DOCUMENT NO. DATE

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November 23, 2011

Electronic Filing

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

Re: Docket No. 110056-TP - Complaint against Verizon Florida, LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service, by Bright House Networks Information Services (Florida), LLC.

Dear Ms. Cole:

Attached for filing in the referenced Docket, please find Bright House Networks Information Services (Florida), LLC's Motion for Extension of Time to File Rebuttal Testimony.

As always, please don't hesitate to contact me if you have any questions or concerns. Thank you for your assistance with this filing.

Sincerely,

Beth Keating 0

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Tallahassee, FL 32301

(850) 521-1706

MEK

DOCUMENT NO.

DATE

08614-11 11/23/1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint against Verizon Florida, LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service by Bright House Networks Information Services (Florida), LLC

Docket No. 110056-TP

MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY

Bright House Networks Information Services (Florida), LLC, ("Bright House") hereby files this motion requesting that the filing date for Rebuttal Testimony be extended from December 2, 2011, to December 16, 2011. In support of this motion, Bright House states the following:

- 1. The Order Establishing Procedure in this docket, Order No. PSC-11-0417-PCO-TP, which was issued September 27, 2011, established the filing date for the parties' Rebuttal Testimony as December 2, 2011.
- 2. On October 27, 2011, the FCC adopted its Report and Order and Notice of Proposed Rulemaking ("Order") addressing comprehensive reforms to the Universal Service Fund and Intercarrier Compensation mechanisms.¹ The complete text of the Order was subsequently issued on November 18, 2011. MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon") and Bright House are currently reviewing the voluminous, 751-page Order to determine whether and to what extent findings in the FCC's recent decision should be addressed in Rebuttal Testimony. Because the text of the Order was

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¹ Report and Order and Notice of Proposed Rulemaking, Order FCC 11-161, issued in WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, November 18, 2011.

issued only recently and is, as noted, quite lengthy, Bright House respectfully requests that the date for filing Rebuttal Testimony by both Parties be extended to December 16, 2011, to allow the Parties sufficient time to digest the FCC's decision and address it, to the extent appropriate, in Rebuttal Testimony.

 Counsel for Bright House has discussed this request with Verizon and can represent that Verizon consents to this motion.

WHEREFORE, Bright House respectfully requests that the Commission approve its motion to extend the filing date for both parties' Rebuttal Testimony to December 16, 2011.

Respectfully submitted this 23rd day of November, 2011,

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Attorneys for: Bright House Networks Information Services (Florida), LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email, and/or Hand Delivery this <u>23rd</u> day of November, 2011.

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