

**Dorothy Menasco**

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**Sent:** Wednesday, December 14, 2011 4:42 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'O'Roark, Dulaney L'; 'Caswell, Kimberly (Kim)'; 'Savage, Christopher'; 'Dodge, John'; Johnson, Marva B.; Larry Harris; Kevin Bloom  
**Subject:** Docket NO. 110056  
**Attachments:** 20111214163546221.pdf

Attached for filing in the docket referenced, is a copy of Bright House's Motion for Further 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:**

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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:** 5

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



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December 14, 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 Further 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  
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MEK

**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 FURTHER EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY**

Bright House Networks Information Services (Florida), LLC, ("Bright House") hereby files this motion requesting an additional extension of the filing date for Rebuttal Testimony from December 16, 2011, until January 4, 2012. 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.<sup>1</sup> 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

<sup>1</sup> 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.

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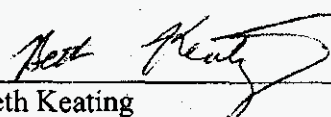
issued only recently and is, as noted, quite lengthy, Bright House sought an extension of the date for filing Rebuttal Testimony by both parties until December 16, 2011. By Order No. PSC-11-0549-PCO-TP, issued November 30, 2011, the Prehearing Officer granted the requested extension.

3. In recent days, based on their analysis and review of the FCC's recent order regarding intercarrier compensation, the parties have engaged in initial discussions geared towards the development of a possible settlement of the matters in dispute in this Docket. While the discussions are nascent, Bright House believes that allowing the parties an additional extension of the date for filing Rebuttal Testimony will provide the parties with an opportunity to further their discussions in an effort to reach a mutually acceptable resolution. Bright House therefore respectfully requests that the date for filing Rebuttal Testimony in this proceeding be further extended to January 4, 2012. In requesting this extension, Bright House asks only that the date for Rebuttal Testimony be extended and that all other key dates set forth in the Order Establishing Procedure remain unchanged.
4. In support of this request, Bright House emphasizes that there will still be over two months between the filing of rebuttal testimony and the hearing in this matter, should settlement not be reached, including nearly 8 full weeks between the requested filing date and the discovery cut-off date set forth in the Order Establishing Procedure (February 28). As such, under the current discovery response time of 20 days, there should be sufficient time for two rounds of discovery should the parties be unable to reach a settlement.

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

WHEREFORE, Bright House respectfully requests that the Commission approve its motion to further extend the filing date for both parties' Rebuttal Testimony to January 4, 2012.

Respectfully submitted this 14th day of December, 2011,

By: 

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**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 14th day of December, 2011.

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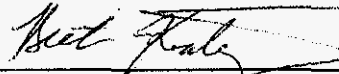
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