

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

RECEIVED-FPSC  
2016 MAR 21 AM 9:19  
COMMISSION  
CLERK

VERIZON FLORIDA LLC,

Complainant,

v.

FLORIDA POWER & LIGHT  
COMPANY,

Respondent.

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

Docket No. 15-73  
File No. EB-15-MD-002

Related to  
Docket No. 14-216  
File No. EB-14-MD-003

**RESPONDENT FLORIDA POWER & LIGHT COMPANY'S  
MOTION FOR LEAVE TO FILE**

Respondent Florida Power & Light Company ("FPL"), by and through its attorneys, respectfully submits this Motion for Leave to File and requests that the Bureau grant FPL leave to submit the accompanying Reply in Support of FPL's Motion for Leave to File Record Supplement ("Reply"). As more fully discussed in the attached brief, Verizon's recently filed Opposition<sup>1</sup> contains misstatements and mischaracterizations that FPL should be allowed to address. In addition, as Verizon itself has noted, this is a proceeding which is of significance to the industry.<sup>2</sup> It therefore merits as complete and thorough a record and consideration as possible. As such, good cause exists to permit the filing and consideration of the attached Reply.

For the foregoing reasons, FPL respectfully requests that the Commission grant it leave to file the attached Reply in Support of FPL's Motion for Leave to File Record Supplement.

<sup>1</sup> Verizon Florida's Opposition to Florida Power and Light Company's Motion for Leave to File a Record Supplement, March 7, 2016, 15-73, EB-15-MD-002 ("Opposition").  
<sup>2</sup> Pole Attachment Complaint Reply, *Verizon Fla. LLC v. Fla. Power & Light Co.*, Docket No. 15-73, File No. EB-15-MD-002 (Nov. 24, 2015)("Verizon Reply"), p. 2.

Respectfully submitted,

CZ

Maria Jose Moncada  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
(561) 304-5795  
Maria.Moncada@fpl.com

Alvin B. Davis  
Squire Patton Boggs (US) LLP  
200 South Biscayne Boulevard  
Suite 300  
Miami, FL 33131  
(305) 577-2835  
Alvin.Davis@squiresanders.com

---

Charles A. Zdebski  
Gerit F. Hull  
Robert J. Gastner  
Eckert Seamans Cherin & Mellott, LLC  
1717 Pennsylvania Avenue, N.W., Suite 1200  
Washington, D.C. 20006  
(202) 659-6600  
czdebski@eckertseamans.com  
ghull@eckertseamans.com  
rgastner@eckertseamans.com  
*Counsel to Florida Power & Light Company*

## CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2016, I caused a copy of the foregoing Respondent's Motion for Leave to File to be served on the following by hand delivery, U.S. mail or electronic mail (as indicated):

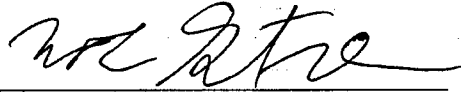
Christopher S. Huther, Esq.  
Claire J. Evans, Esq.  
Wiley Rein LLP  
1776 K Street, N.W.  
Washington, DC 20006  
chuther@wileyrein.com  
(Via e-mail)  
Attorneys for Verizon Florida LLC

William H. Johnson  
Katharine R. Saunders  
VERIZON  
1320 N. Courthouse Road  
9th Floor  
Arlington, VA 22201  
katharine.saunders@verizon.com  
(Via e-mail)

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554  
(Via Hand Delivery)

Kimberly D. Bose, Secretary  
Nathaniel J. Davis, Sr., Deputy Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426  
(Via U.S. Mail)

Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
(Via U.S. Mail)

A handwritten signature in black ink, appearing to read "R. J. Gastner", written over a horizontal line.

Robert J. Gastner