

Before the  
Federal Communications Commission  
Washington, DC 20554

BELLSOUTH TELECOMMUNICATIONS,\*  
LLC D/B/A AT&T FLORIDA \*

Complainant, \*

v. \*

FLORIDA POWER & LIGHT  
COMPANY, \*

Respondent. \*

Proceeding No.: 20-214  
File No.: EB-20-MD-002

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**JOINT MOTION FOR EXTENSION OF TIME**

Respondent, Florida Power & Light Company (“FP&L”) and Complainant, BellSouth Telecommunications LLC d/b/a AT&T Florida (“AT&T”) (collectively, the “Parties”), by and through their respective counsel, and pursuant to Rule 1.46, respectfully submit this motion requesting an extension to file their Joint Statement. In support hereof, the Parties state as follows:

1. AT&T filed the complaint in this matter on July 6, 2020. The Federal Communications Commission (the “Commission” or “FCC”) provided a Notice of Complaint to FP&L on July 9, 2020 (“Notice”).

2. FP&L filed Motions for Adjustment of Deadlines on July 24, September 3, and September 24, 2020.

3. By Letters dated July 27, September 10, and September 25, 2020, the Commission’s Enforcement Bureau (“Bureau”) granted FP&L’s Motions for Adjustment of Deadlines. The Bureau’s September 25, 2020 Letter contains the current procedural schedule.

4. Pursuant to the schedule set in the Bureau's September 25, 2020 Letter, FP&L filed its Answer and Brief in Support on October 21, 2020 and AT&T filed its Reply and Reply Legal Analysis on December 4, 2020.

5. The Bureau's September 25, 2020 Letter includes a deadline for FP&L and AT&T to file their Joint Statement on December 21, 2020.

6. The Commission's complaint procedure rules allow for motions for extensions of time. *See* 47 C.F.R. § 1.46 & § 1.729.

7. On December 17, 2020, counsel for the Parties requested a conference call with Bureau Staff to discuss the Joint Statement.

8. On December 21, 2020, counsel for the Parties and Bureau Staff had a conference call during which they discussed the Joint Statement and an extension of its filing deadline.

9. Consistent with the December 21, 2020 conference call, the Parties hereby request that the current deadline to file the Joint Statement be extended from December 21, 2020 to January 15, 2021.

10. The undersigned counsel has communicated with counsel for AT&T, and AT&T does not oppose the schedule adjustment requested in Paragraph 9 herein.

WHEREFORE, the Parties jointly and respectfully request that the Commission grant this Motion and extend the deadline to file the Joint Statement to January 15, 2021.

Respectfully submitted,

/s/ Cody T. Murphey

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 30, 2020, I caused a copy of the foregoing Motion for Extension of Time to be served on the following by hand delivery, U.S. mail or electronic mail (as indicated):

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