

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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

Complainant,

v.

FLORIDA POWER & LIGHT  
COMPANY,

Respondent.

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Proceeding No.: 19-187  
File No.: EB-19-MD-06

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

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COMMISSION  
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**FLORIDA POWER & LIGHT COMPANY'S MOTION  
FOR EXTENSION OF TIME**

Pursuant to 47 C.F.R. § 1.46, Respondent, Florida Power & Light Company ("FP&L"), by and through its attorneys, respectfully submits this motion requesting an extension time to file its opposition to BellSouth Telecommunications, LLC d/b/a AT&T Florida's ("AT&T") Application for Review ("Application"). In further support hereof, FP&L states as follows.

1. AT&T filed its Application to the Federal Communications Commission (the "Commission" or "FCC") in this matter on September 15, 2021.
2. The Application seeks Commission review of four Enforcement Bureau Memorandum Opinions and Orders ("Orders"), issued May 20, 2020, January 14, 2021, and August 16, 2021 in Proceeding No. 19-187 and on August 16, 2021 in Proceeding No. 20-214.
3. Under the Commission's rules, FP&L's Opposition to AT&T's Application would ordinarily be due within 15 days of the Application being filed; *i.e.*, September 30, 2021. 47 C.F.R. § 1.115(d).
4. The Commission's rules allow for extensions of time. *See* 47 C.F.R. §§ 1.46, 1.729.

5. FP&L requests that the Commission extend the current deadline of September 30, 2021 until October 29, 2021 and allow that any confidential versions of FPL's Opposition may be hand-delivered to the Commission the following business day. Good cause exists for this extension for several reasons.

6. First, AT&T has had substantial amounts of time to analyze each of the four Orders since they were issued and to prepare its arguments; FPL seeks a reciprocally fair amount of time to do the same.

7. Second, lead FCC counsel for FPL already has multiple matters with pressing deadlines over the next several weeks.

8. Third, inside counsel for FPL has an impending trial and must devote substantially all of the next several weeks to trial preparation, trial conduct and post-trial briefing.

9. An extension of time will allow FPL and all counsel sufficient time to work fully and diligently together to brief the relevant issues for the benefit of the Commission's review.

10. The undersigned counsel has communicated with counsel for AT&T and AT&T does not oppose a fifteen (15) day extension of FPL's deadline to file its Opposition to October 15, 2021 provided that the deadline for AT&T to file its Reply is extended to October 29, 2021. FPL consents to an extension of AT&T's deadline to file its Reply.

Wherefore, pursuant to 47 C.F.R. § 1.46, Respondent FPL respectfully requests that for the above reasons, the Commission extend the deadline for the filing of FPL's Opposition in this matter until October 29, 2021.

Respectfully submitted,

ECKERT SEAMANS CHERIN & MELLOTT, LLC

/s/ Cody T. Murphey

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2021, 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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/s/ Cody T. Murphey

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