

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Level 3 Communications, LLC

and

Broadwing Communications, LLC,

Complainants,

v.

Neutral Tandem-Michigan, LLC,

Respondent.

Case No. 07-668-TP-CSS


**JOINT MOTION FOR EXTENSION OF TIME
AND
REQUEST FOR EXPEDITED RULING**

Pursuant to Rule 4901-1-13, Ohio Administrative Code ("OAC"), Level 3 Communications, LLC and Broadwing Communications, LLC (collectively, "Level 3") and Neutral Tandem-Michigan, LLC and Neutral Tandem, Inc. (collectively, "Neutral Tandem"), hereby move for a three-week extension of the otherwise applicable due dates for filings in this proceeding for the reasons set forth in the accompanying memorandum in support. An expedited ruling is requested.

WHEREFORE, Level 3 and Neutral Tandem respectfully request that their joint motion be granted and that an expedited ruling be issued.

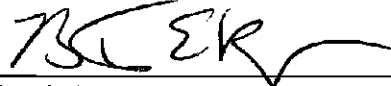
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Respectfully submitted,


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By a joint motion filed herein on August 15, 2007, Level 3 and Neutral Tandem requested a two-week extension of otherwise applicable due dates for filings in this proceeding. As explained in the memorandum accompanying the motion, the purpose of the requested extension was to permit Level 3 and Neutral Tandem to engage in settlement discussions that might ultimately lead to a stipulation that will resolve all issues presented in this case without the need for further proceedings. On August 17, 2007, the attorney examiner issued an entry granting the joint motion and extending the due date for Neutral Tandem's response to Level 3's motion to dismiss Neutral Tandem's counterclaim to August 29, 2007, and the due date for Level

3's response to Neutral Tandem's motion to dismiss the complaint as moot to September 4, 2007.

On August 29, 2007, Level 3 and Neutral Tandem filed a second joint motion for an extension of time, again requesting that the due dates for the each of the above-referenced filings be moved back two weeks. In the memorandum accompanying the motion, the parties represented that they were close to an agreement that would result in a voluntary dismissal of the Level 3 complaint and Neutral Tandem counterclaim, but the agreement had not yet been finalized. The attorney examiner granted the second joint motion by entry in this docket of August 31, 2007.

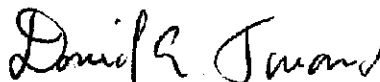
Level 3 and Neutral Tandem have continued to engage in settlement negotiations, and continue to believe that a settlement will be reached. However, the stipulation embodying the terms of the settlement agreement has yet to be finalized. Thus, Level 3 and Neutral Tandem find it necessary to again request an extension of the due dates for the two filings identified above. Level 3 and Neutral Tandem regret any additional burden this request for an extension may impose on the Commission, but would again note that the interests of all concerned will be best served by avoiding the expenditure of time and resources that would be required to prepare pleadings which, ultimately, may not be necessary. Level 3 and Neutral Tandem submit that this constitutes good cause for the requested extension within the meaning of that term as employed in Rule 4901-1-13(A), OAC. Further, Level 3 and Neutral Tandem are the only parties to this proceeding. Thus, no person or party will be prejudiced if their joint motion is granted.

Consistent with the foregoing discussion, Level 3 and Neutral Tandem respectfully request that the due date for Neutral Tandem's response to Level 3's motion to dismiss Neutral Tandem's counterclaim be extended from September 12, 2007 to October 3, 2007, and that the

due date for Level 3's response to Neutral Tandem's motion to dismiss the complaint as moot be extended from September 18, 2007 to October 9, 2007. Because Neutral Tandem's response to Level 3's motion to dismiss Neutral Tandem's counterclaim would otherwise be due this date, an expedited ruling is requested. As required by Rule 4901-1-12(C), OAC, undersigned counsel certify that no party objects to an expedited ruling on their joint motion.

WHEREFORE, Level 3 and Neutral Tandem respectfully request that their joint motion be granted and that an expedited ruling be issued.

Respectfully submitted,



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