

**FILE**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Revolution )  
Communications Company, Ltd., Against )  
AT&T Ohio for Unjust and Unreasonable )  
Billings and Other Violations Under the )  
Parties' Interconnection Agreement. )

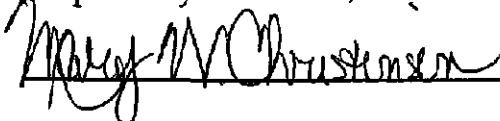
Case No. 06-427-TP-CSS

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PUCO

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF  
AND REQUEST FOR EXPEDITED RULING**

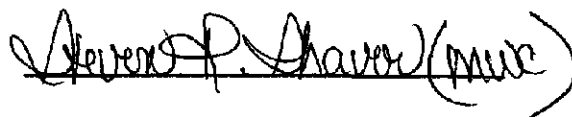
Pursuant to Ohio Administrative Code ("OAC") Rules 4901-1-12 generally and 4901-1-12(C) in particular and 4901-1-13(A) and (B), Revolution Communications Company, Ltd., ("Revolution") respectfully moves the Public Utilities Commission of Ohio ("PUCO") to grant Revolution an extension of time until November 12, 2007 to file its initial brief otherwise due in this matter on November 7, 2007 and for an expedited ruling, to which respondent AT&T Ohio ("AT&T") does not object, as further set forth below. The reasons for the motion and the request for expedited ruling are stated in the following Memorandum in Support.

Respectfully submitted,



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## MEMORANDUM IN SUPPORT

Revolution filed the complaint in this matter on March 15, 2006. After Commission-assisted mediation concluded, the Commission scheduled a hearing in this matter, which had previously been continued by agreement of the parties. The continued hearing was to begin on September 20, 2007. In the meantime, the parties agreed to forego the public hearing and to brief the matter based on the record of this proceeding. The then existing public record was to be supplemented, by agreement of the parties, with deposition transcripts and other discovery responses, with each filing the responses that it obtained from the other party. The initial briefs of both parties, per Attorney Examiner Entry issued September 19, 2007, were to be filed on November 7, 2007 and the reply briefs, December 5, 2007.

Revolution requests this extension because of circumstances beyond its counsel's control. Last week, a magistrate ruling in a matter for which Revolution's trial counsel in this matter was also trial counsel required the parties in the other unrelated matter to conduct last-minute depositions through the end of last week and the beginning of this. As a result, the completion of the initial brief to be filed in this matter has been interrupted.

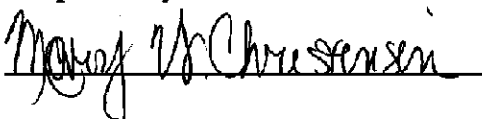
Revolution has informed counsel for AT&T of this development and has asked for agreement to an extension of the initial brief filing date. AT&T has indicated that it has no objection to Revolution's request for an extension of time to file the initial briefs on November 12, 2007 and has no objection to Revolution's request for an expedited ruling. The parties are not, by this motion,

proposing to change the reply brief date set out in the September 19, 2007

Attorney Examiner's entry.

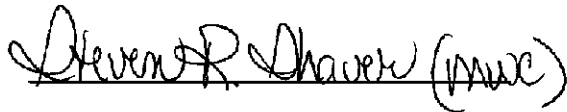
Revolution believes that the delay in filing the initial briefs in this matter will not cause prejudice either to the PUCO as trier of fact or AT&T, which does not object. Therefore, Revolution respectfully requests the PUCO's favorable consideration and granting of its motion.

Respectfully submitted,



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#### CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion for extension of time and request for expedited ruling of Revolution Communications Company, Ltd. in PUCO Case No. 06-427-TP-CSS has been served by e-mail and U.S. Mail, first class postage prepaid, to Jon F. Kelly, Esq., 150 East Gay Street, Room 4-A, Columbus OH 43215 this 5th day of November, 2007.

  
Mary W. Christensen