

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Adoption of Chapter)	
4901:1-3, Ohio Administrative Code,)	Case No. 13-579-AU-ORD
Concerning Access to Poles, Ducts, Conduits,)	
And Rights-of-Way Provided by Public Utilities.)	

**MOTION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS
AND MEMORANDUM IN SUPPORT OF THE OHIO TELECOM ASSOCIATION**

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JULY 22, 2013

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BEFORE
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In the Matter of the Adoption of Chapter)
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OF THE OHIO TELECOM ASSOCIATION**

Pursuant to Rule 4901-1-12 and 4901-1-13, Ohio Administrative Code (O.A.C.), the Ohio Telecom Association (“OTA”) on behalf of its member companies, submits to the Public Utilities Commission of Ohio (“Commission”) this Motion for Extension of Time to File Reply Comments. Initial comments in this proceeding were filed on July 12, 2013, with reply comments due to be filed on July 30, 2013.

Respectfully, the OTA hereby requests that the due date for reply comments be extended by thirty days. The reasons for this motion are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

/s/ Scott E. Elisar

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MEMORANDUM IN SUPPORT

On May 15, 2013, the Commission issued an Entry in Case No. 13-579-AU-ORD, *In the Matter of the Adoption of Chapter 4901:1-3, Ohio Administrative Code, Concerning Access to Poles, Ducts, Conduits and Rights-of-Way Provided by Public Utilities*. Per this Entry, the Commission ordered all interested parties to file comments and reply comments on the proposal. Per the Commission's June 4, 2013 Entry, initial comments were due by July 12, 2013, with reply comments due by July 30, 2013.

The more than two hundred pages of initial comments submitted by twelve parties in this proceeding on July 12, 2013, reveal the depth and complexity associated with the Commission's proposed rules. As such, additional time is required so that the parties engaged in this proceeding may be able to provide the necessary and appropriate level of legal analysis that is required to diligently formulate reply comments in this important matter.

For the reasons stated above, respectfully, the OTA hereby requests that the due date for reply comments be extended by thirty days.

Respectfully submitted,

/s/ Scott E. Elisar

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ATTORNEY FOR THE OHIO TELECOM ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Extension of Time to File Reply Comments and Memorandum in Support of the Ohio Telecom Association* was served upon the following parties of record this 22nd day of July, 2013, via electronic transmission.

/s/ Scott E. Elisar

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/22/2013 12:45:23 PM

in

Case No(s). 13-0579-AU-ORD

Summary: Motion for Extension of Time to File Reply Comments and Memorandum in Support electronically filed by Scott E. Elisar on behalf of Ohio Telecom Association