

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s Review	)	
of Ohio Adm. Code Chapter 4901:1-3,	)	Case No. 19-834-AU-ORD
Concerning Access to Poles, Ducts, and	)	
Conduits, and Right-of-Way.	)	

**JOINT MOTION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS  
AND  
REQUEST FOR EXPEDITED RULING  
BY THE OHIO CABLE TELECOMMUNICATIONS ASSOCIATION,  
OHIO TELECOM ASSOCIATION  
AND  
CROWN CASTLE FIBER LLC**

Pursuant to Rule 4901-1-13 of the Ohio Administrative Code, the Ohio Cable Telecommunications Association, the Ohio Telecom Association and Crown Castle Fiber LLC (“the Joint Movants”) respectfully ask the Commission for a ten-day extension of time until September 9, 2019, for the filing of reply comments in this matter. The current deadline for filing reply comments is August 30, 2019. To be clear, the Joint Movants propose that September 9, 2019, be the deadline applicable to all parties. Good cause exists for granting the ten-day extension and for granting it in an expedited manner. The reasons supporting the requested extension are contained in the accompanying memorandum in support.

WHEREFORE, the Ohio Cable Telecommunications Association, the Ohio Telecom Association and Crown Castle Fiber LLC respectfully request that the Commission grant, on an expedited basis, this request for a ten-day extension of time until September 9, 2019, for the filing of reply comments in this case. Counsel for the Ohio Cable Telecommunications

Association contacted the other parties who submitted initial comments in this matter and no party objected to the issuance of an expedited ruling pursuant to Rule 4901-1-12(C), Ohio Administrative Code.

Respectfully submitted,

/s/ Frank P. Darr/GLP (per email authorization)

Frank P. Darr (0025469)  
McNees Wallace & Nurick LLC  
21 E. State Street, 17<sup>th</sup> Floor  
Columbus, OH 43215  
614-719-2855  
[fdarr@mcneeslaw.com](mailto:fdarr@mcneeslaw.com)

*Attorneys for the Ohio Telecom Association*

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci (0046608)  
Vorys, Sater, Seymour and Pease LLP  
52 E. Gay Street / P.O. Box 1008  
Columbus, OH 43216-1008  
614-464-5407  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

*Attorneys for the Ohio Cable  
Telecommunications Association*

/s/ Rebecca L. Hussey/GLP (per email authorization)

Rebecca L. Hussey (0079444)  
Utility Relations Counsel  
Crown Castle Fiber LLC  
2 Easton Oval, Suite 425  
Columbus, OH 43219  
614-657-4294  
[rebecca.hussey@crowncastle.com](mailto:rebecca.hussey@crowncastle.com)

**MEMORANDUM IN SUPPORT OF THE JOINT MOTION FOR EXTENSION OF  
TIME TO FILE REPLY COMMENTS  
AND  
REQUEST FOR EXPEDITED RULING  
BY THE OHIO CABLE TELECOMMUNICATIONS ASSOCIATION,  
OHIO TELECOM ASSOCIATION  
AND  
CROWN CASTLE FIBER LLC**

By Entry of July 17, 2019, the current deadline for the filing of reply comments in this matter was set for Friday, August 30, 2019. Given the complexity of the issues and various positions advanced in the initial comments, Joint Movants request additional time to prepare reply comments. The current deadline for the reply comments also falls in the midst of other deadlines (including several Commission deadlines), and additional time will allow all matters to be properly addressed. The trade associations further request the extension of time so that their members have adequate time to discuss and develop their respective reply comments. The Joint Movants submit that ten days is reasonable in light of the intervening holiday – Labor Day.

The Joint Movants submit that good cause exists for extending the deadline by ten days until September 9, 2019. No harm will result as the Joint Movants respectfully request that the extension apply to all parties. Additionally, the Joint Movants request an expedited ruling on this motion so that they are promptly aware of the ruling. Counsel for the Ohio Cable Telecommunications Association contacted the other parties who submitted initial comments in this matter and no party objected to the issuance of an expedited ruling pursuant to Rule 4901-1-12(C), Ohio Administrative Code.

WHEREFORE, the Ohio Cable Telecommunications Association, the Ohio Telecom Association and Crown Castle Fiber LLC respectfully request that the Commission grant its Joint Motion for a ten-day extension of time to file reply comments until Monday, September 9, 2019.

Respectfully submitted,

/s/ Frank P. Darr/GLP (per email authorization)

Frank P. Darr (0025469)  
McNees Wallace & Nurick LLC  
21 E. State Street, 17<sup>th</sup> Floor  
Columbus, OH 43215  
614-719-2855  
[fdarr@mcneeslaw.com](mailto:fdarr@mcneeslaw.com)

*Attorneys for the Ohio Telecom Association*

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci (0046608)  
Vorys, Sater, Seymour and Pease LLP  
52 E. Gay Street / P.O. Box 1008  
Columbus, OH 43216-1008  
614-464-5407  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

*Attorneys for the Ohio Cable  
Telecommunications Association*

/s/ Rebecca L. Hussey/GLP (per email authorization)

Rebecca L. Hussey (0079444)  
Utility Relations Counsel  
Crown Castle Fiber LLC  
2 Easton Oval, Suite 425  
Columbus, OH 43219  
614-657-4294  
[rebecca.hussey@crowncastle.com](mailto:rebecca.hussey@crowncastle.com)

## **CERTIFICATE OF SERVICE**

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, I certify that a copy of the foregoing document will be served via electronic mail on all parties listed below this 23<sup>rd</sup> day of August 2019.

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci

[rendris@firstenergycorp.com](mailto:rendris@firstenergycorp.com)  
[rocco.dascenzo@duke-energy.com](mailto:rocco.dascenzo@duke-energy.com)  
[jeanne.kingery@duke-energy.com](mailto:jeanne.kingery@duke-energy.com)  
[stnourse@aep.com](mailto:stnourse@aep.com)  
[cblend@aep.com](mailto:cblend@aep.com)  
[tswolffram@aep.com](mailto:tswolffram@aep.com)  
[randall.griffin@aes.com](mailto:randall.griffin@aes.com)  
[rebecca.hussey@crowncastle.com](mailto:rebecca.hussey@crowncastle.com)  
[diane.c.browning@sprint.com](mailto:diane.c.browning@sprint.com)  
[fdarr@mcneeslaw.com](mailto:fdarr@mcneeslaw.com)  
[dthomas@sheppardmullin.com](mailto:dthomas@sheppardmullin.com)

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Summary: Motion Joint Motion for Extension of Time to File Reply Comments and Request for Expedited Ruling electronically filed by Mrs. Gretchen L. Petrucci on behalf of Ohio Cable Telecommunications Association and Ohio Telecom Association and Crown Castle Fiber LLC