**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s )

Investigation into Intrastate Carrier ) Case No. 10-2387-TP-COI

Access Reform Pursuant to Sub. S.B. 162 )

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**SMALL INCUMBENT LOCAL EXCHANGE CARRIERS’**

**MOTION FOR EXTENSION OF TIME**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Pursuant to Ohio Adm. Code 4901-1-12 and 4901-1-13, most of the Ohio small incumbent local exchange carriers[[1]](#footnote-1) (“Small ILECS”) respectfully move for an extension of time in which to comply with the February 29, 2012 Entry directing them to file an application to amend their respective intrastate access tariffs by March 21, 2012. Because of the large number of applications that need to be filed, and the complexity of the calculations involved, among other reasons, the Small ILECS respectfully request an extension until April 11, 2012 to submit the required applications. This extension is being sought in good faith and without any intention to cause any undue delay.

This Motion should be granted for good cause as set forth more fully in the accompanying memorandum in support.

Respectfully submitted,

SMALL INCUMBENT LOCAL EXCHANGE CARRIERS

By: /s/ Carolyn S. Flahive

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 Their Attorney

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**MEMORANDUM IN SUPPORT**

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Ohio Adm. Code 4901-1-13(A) permits extensions of time to file pleadings and other papers upon a showing of good cause. An extension of three weeks, up to and through April 11, 2012, for the Small ILECS to file applications to amend their tariffs is warranted due to the complexity of each application, including the relevant calculations and supporting documents related thereto. Preparation of those applications is a time-consuming process, and a three-week extension will ensure that counsel and the Small ILECS’ external consultants have sufficient time to interpret the Federal Communications Commission’s November 18, 2011 Report and Order and the pertinent federal regulation to ensure the Small ILECS’ applications are fully compliant with the comprehensive requirements. Further compounding the time-intensive nature of these applications is that the Small ILECS are represented by the undersigned counsel, who is scheduled to be out of the country over the next two weeks. The Small ILECS will be greatly prejudiced if required to submit its applications on or before March 21, 2012.

No prior extensions have been sought by the Small ILECS. An additional three weeks will not disrupt these proceedings or cause any undue delay to any other party For all the foregoing reasons, the Small ILECS respectfully request that their Motion be granted.

Respectfully submitted,

SMALL INCUMBENT LOCAL EXCHANGE CARRIERS

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# CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Motion was served via electronic mail to the persons listed below this 2nd day of March, 2012.

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/s/ Carolyn S. Flahive

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1. Arcadia Telephone Company, Benton Ridge Telephone Company, Columbus Grove Telephone Company, Continental Telephone Company, Little Miami Communications Corp., Oakwood Telephone Company, Vanlue Telephone Company, Arthur Mutual Telephone Company, Bascom Mutual Telephone Company, Buckland Telephone Company, The Champaign Telephone Company, The Conneaut Telephone Company, Farmers Mutual Telephone Company, Fort Jennings Telephone Company, The Germantown Independent Telephone Company, Glandorf Telephone Company, Inc., Kalida Telephone Company, Inc., McClure Telephone Company, Middle Point Home Telephone Company, Minford Telephone Company, New Knoxville Telephone Company, Orwell Telephone Company, The Ottoville Mutual Telephone Company, Pattersonville Telephone Company, Ridgeville Telephone Company, Sherwood Mutual Telephone Association, Inc., Sycamore Telephone Company, Telephone Service Company, Vaughnsville Telephone Company, Wabash Mutual Telephone Company. [↑](#footnote-ref-1)