**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 )

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

**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

Carolyn S. Flahive

THOMPSON HINE LLP

41 South High Street, Suite 1700

Columbus, Ohio 43215-6101

(614) 469-3294

Their Attorney

**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 )

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

**MEMORANDUM IN SUPPORT**

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

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

By: /s/ Carolyn S. Flahive

Carolyn S. Flahive

THOMPSON HINE LLP

41 South High Street, Suite 1700

Columbus, Ohio 43215-6101

(614) 469-3294

Their Attorney

700465.2

# 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.

Terry Etter

Office of the Ohio Consumers’ Counsel

10 West Broad Street, Suite 1800

Columbus, OH 43215-3485

[etter@occ.state.oh.us](mailto:etter@occ.state.oh.us)

Douglas E. Hart

Cincinnati Bell Telephone Company LLC

441 Vine Street, Suite 4192

Cincinnati, OH 45202

[dhart@douglasehart.com](mailto:dhart@douglasehart.com)

Barth E. Royer

Bell & Royer Co., LPA

33 South Grant Avenue

Columbus, OH 43215-3927

[barthroyer@aol.com](mailto:barthroyer@aol.com)

Garnet Hanly

T-Mobile USA, Inc.

401 Ninth Street, NW, Suite 550

Washington, DC 20004

[garnet.hanly@t-mobile.com](mailto:garnet.hanly@t-mobile.com)

William Adams

Bailey Cavalieri LLC

10 West Broad Street, Suite 2100

Columbus, OH 43215-3422

[William.Adams@BaileyCavalieri.com](mailto:William.Adams@BaileyCavalieri.com)

Norman J. Kennard

Regina L. Matz

Teresa Thomas

Thomas, Long, Niesen & Kennard

212 Locust St., Suite 500

P.O. Box 9500

Harrisburg, PA 17108

[nkennard@thomaslonglaw.com](mailto:nkennard@thomaslonglaw.com)

[rmatz@thomaslonglaw.com](mailto:rmatz@thomaslonglaw.com)

Mary Ryan Fenlon

Jon F. Kelly

AT&T Services, Inc.

150 East Gay Street, Room 4C

Columbus, OH 43215

[mfl842@att.com](mailto:mfl842@att.com)

[jk2961@att.com](mailto:jk2961@att.com)

David Haga

Verizon

1320 North Courthouse Road

Arlington, VA 22201

[david.haga@verizon.com](mailto:david.haga@verizon.com)

Zxuzsanna E. Benedek

CenturyLink

240 North Third Street, Suite 300

Harrisburg, PA 17101

[sue.benedek@centurylink.com](mailto:sue.benedek@centurylink.com)

Thomas J. O’Brien

Bricker & Eckler LLP

100 South Third Street

Columbus, OH 453215-4291

[tobrien@bricker.com](mailto:tobrien@bricker.com)

Richard R. Parsons

Kravitz Brown & Dortch LLC

65 East State Street, Suite 200

Columbus, OH 43215

[rparsons@kravitzll.com](mailto:rparsons@kravitzll.com)

Kate Dutton

Access Point, Inc.

1100 Crescent Green, Suite 109

Cary, NC 27518

[kate.dutton@accesspointinc.com](mailto:kate.dutton@accesspointinc.com)

Mary T. Buley

300 South Highway 169, Suite 700

Minneapolis, MN 55426

[mary.buley@onvoy.com](mailto:mary.buley@onvoy.com)

Diane C. Browning

Sprint Nextel

6450 Sprint Parkway

Mailstop KSOPHN0314-3A459

Overland Park, KS 66251

[diane.c.browning@sprint.com](mailto:diane.c.browning@sprint.com)

Kevin Saville

Frontier Communications Corporation

2378 Wilshire Boulevard

Mound, MN 55364

[kevin.saville@ftr.com](mailto:kevin.saville@ftr.com)

Sandi Murphy

First Telecom Services, LLC

3340 West Market Street

Akron, Ohio 44333

[smurphy@firstcomm.com](mailto:smurphy@firstcomm.com)

Benita Kahn

Stephen M. Howard

Vorys, Sater, Seymour & Pease, LLP

52 E. Gay Street, PO Box 1008

Columbus, OH 43216-1008

[bakahn@vorys.com](mailto:bakahn@vorys.com)

[smhoward@vorys.com](mailto:smhoward@vorys.com)

Gary Baki

CenturyLink

50 W. Broad Street, Suite 3600

Columbus, OH 43215

[gary.s.baki@centurylink.com](mailto:gary.s.baki@centurylink.com)

D. Anthony Mastando

Vice President, Regulatory Affairs

7037 Old Madison Pike

Huntsville, AL 35806

[tony.mastando@corp.earthlink.com](mailto:tony.mastando@corp.earthlink.com)

William Wright

Assistant Attorney General

Chief, Public Utilities Section

180 East Broad Street, 6th Floor

Columbus, OH 43215-3793

william.wright@puc.state.oh.us

Gary M. Zingaretti

ICORE

253 South Franklin Street

Wilkes-Barre, PA 18701

[gzing@icoreinc.com](mailto:gzing@icoreinc.com)

Laura McGrath

Technologies Management, Inc.

2600 Maitland Center Parkway

Maitland, FL 32751

[lmcgrath@tminc.com](mailto:lmcgrath@tminc.com)

Mary Cegelski

First Communications, Inc.

15278 Neo Parkway

Garfield Heights, OH 44128

[mcegelski@firstcomm.com](mailto:mcegelski@firstcomm.com)

/s/ Carolyn S. Flahive

Carolyn S. Flahive

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)