

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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Level 3 Communications, LLC

and

Broadwing Communications, LLC,

Complainants,

v.

Neutral Tandem-Michigan, LLC,

Respondent.

Case No. 07-668-TP-CSS

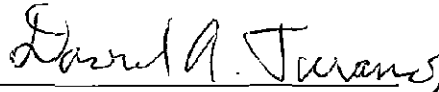
**JOINT MOTION FOR EXTENSION OF TIME
AND
REQUEST FOR EXPEDITED RULING**

Pursuant to Rule 4901-1-13, Ohio Administrative Code ("OAC"), Level 3 Communications, LLC and Broadwing Communications, LLC (collectively "Level 3") and Neutral Tandem-Michigan, LLC and Neutral Tandem, Inc. (collectively, "Neutral Tandem"), hereby move for a two-week extension of the otherwise applicable due dates for filings in this proceeding for the reasons set forth in the accompanying memorandum in support. An expedited ruling is requested.

WHEREFORE, Level 3 and Neutral Tandem respectfully request that their joint motion be granted and that an expedited ruling be issued.

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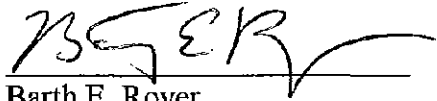
Respectfully submitted,



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Neutral Tandem, Inc.

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Complainants,)	Case No. 07-668-TP-CSS
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)	

**MEMORANDUM IN SUPPORT
OF
JOINT MOTION FOR EXTENSION OF TIME
AND
REQUEST FOR EXPEDITED RULING**

By a joint motion filed herein on August 15, 2007, Level 3 and Neutral Tandem requested a two-week extension of otherwise applicable due dates for filings in this proceeding. As explained in the memorandum accompanying the motion, the purpose of the requested extension was to permit Level 3 and Neutral Tandem to engage in settlement discussions that might ultimately lead to a stipulation that will resolve all issues presented in this case without the need for further proceedings. On August 17, 2007, the attorney examiner issued an entry granting the joint motion and extending the due date for Neutral Tandem's response to Level 3's motion to dismiss Neutral Tandem's counterclaim to August 29, 2007, and the due date for Level

3's response to Neutral Tandem's motion to dismiss the complaint as moot to September 4, 2007.


Level 3 and Neutral Tandem have, in fact, engaged in settlement discussions, and believe they are close to an agreement that would result in a voluntary dismissal of the Level 3 complaint and Neutral Tandem counterclaim. However, the stipulation embodying the terms of the settlement agreement has not yet received all necessary approvals from the management of the respective parties. Thus, by the foregoing motion, Level 3 and Neutral Tandem have jointly requested a second two-week extension of the dates for the two filings identified above to afford the parties additional time to finalize the stipulation. Level 3 and Neutral Tandem regret any additional burden this second request for an extension may impose on the Commission, but note that the interests of all concerned will be best served if the efforts that would attend filings that may well ultimately prove to be unnecessary can be avoided. Level 3 and Neutral Tandem submit that this constitutes good cause for the requested extension within the meaning of that term as employed in Rule 4901-1-13(A), OAC. Further, Level 3 and Neutral Tandem are the only parties to this proceeding. Thus, no person or party will be prejudiced if their joint motion is granted.

Consistent with the foregoing discussion, Level 3 and Neutral Tandem respectfully request that the due date for Neutral Tandem's response to Level 3's motion to dismiss Neutral Tandem's counterclaim be extended from August 29, 2007 to September 12, 2007, and that the due date for Level 3's response to Neutral Tandem's motion to dismiss the complaint as moot be extended from September 4, 2007 to September 18, 2007. Because Neutral Tandem's response to Level 3's motion to dismiss Neutral Tandem's counterclaim would otherwise be due this date,

an expedited ruling is requested. As required by Rule 4901-1-12(C), OAC, undersigned counsel certify that no party objects to an expedited ruling on their joint motion.

WHEREFORE, Level 3 and Neutral Tandem respectfully request that their joint motion be granted and that an expedited ruling be issued.

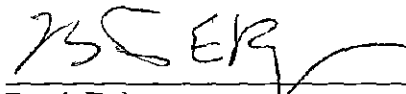
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