

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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|--|---|------------------------|
| In the Matter of the Complaint of AMERICAN |) | |
| BROADBAND AND TELECOMMUNICATION |) | |
| COMPANY, |) | |
| |) | |
| Complainant, |) | Case No. 10-533-TP-CSS |
| |) | |
| v. |) | |
| |) | |
| FRONTIER NORTH, INC., |) | |
| |) | |
| Respondent. |) | |

**JOINT MOTION OF AMERICAN BROADBAND AND TELECOMMUNICATIONS
COMPANY AND FRONTIER NORTH, INC. FOR A STAY OF PROCEEDING**

On April 19, 2010 American Broadband and Telecommunications Company (“American Broadband”) filed a complaint against Frontier North, Inc. “(Frontier” f/k/a Verizon North). American Broadband filed its Motion for Leave to File an Amended Complaint on September 10, 2012. This Motion was granted by Attorney Examiner Entry on October 12, 2012. The Entry also directed Frontier to file its answer by October 29, 2012. American Broadband and Frontier (collectively “the Parties”) respectfully request the Public Utilities Commission of Ohio (“Commission”) to stay the response date to the Amended Complaint to January 7, 2013.

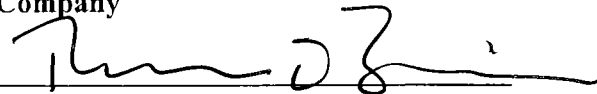
The Parties convened to discuss the matters raised by the Amended Complaint at the offices of American Broadband on October 17, 2012 in an attempt to resolve their differences. The Parties believe that progress can be made towards resolving their disputes and are willing to try to amicably resolve their differences. However, given the complexity of the outstanding issues, additional time is required in order to achieve progress towards a resolution. It is therefore the desire of the parties to stay this proceeding, including the date for Frontier’s

response to the Amended Complaint until January 7, 2013, at which time the Parties will be prepared to either dismiss, or failing settlement, proceed with this matter.

Therefore, the Parties believe it is reasonable for the Commission to stay this proceeding and postpone the response date to the Amended Complaint until January 7, 2013. The parties agree and understand that no defenses, including jurisdictional, are waived by seeking this extension of time.

Respectfully submitted,

**American Broadband and Telecommunications
Company**



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Case No(s). 10-0533-TP-CSS

Summary: Motion of American Broadband and Telecommunications Company and Frontier North, Inc. for a Stay of Proceeding electronically filed by Teresa Orahoad on behalf of American Broadband and Telecommunications Company and Frontier North, Inc.