

FILE

BAILEY CAVALIERI LLC

ATTORNEYS AT LAW

One Columbus 10 West Broad Street, Suite 2100 Columbus, Ohio 43215-3422
telephone 614.221.3155 facsimile 614.221.0479
www.baileycavalieri.com

RECEIVED-DOCKETING DIV

2015 APR -2 PM 4:08

direct dial: 614.229.3278
email: William.Adams@BaileyCavalieri.com

PUCO

April 2, 2015

Barcy McNeal, Secretary
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, OH 43215-3793

Re: ***In the Matter of the Adoption of Chapter 4901:1-3, Ohio Administrative Code, Concerning Access to Poles, Ducts, Conduits, and Rights-of-Way by Public Utilities, Case No. 13-579-AU-ORD***

Dear Ms. McNeal:

Enclosed herewith are the original and two (2) copies of the *Motion to Extend Tariff Amendment Filing Date of The Ohio Rural Broadband Association, Inc.* for filing in the above-captioned matter. Please time-stamp and return the additional copies of the *Motion for Extension* to our courier.

Thank you for your attention to this matter.

Very truly yours,

BAILEY CAVALIERI LLC

William A. Adams

WAA/sg

Enclosure

cc(w/enclosure): Per the attached Service List

BAILEY CAVALIERI LLC
ATTORNEYS AT LAW

SERVICE LIST

Via Electronic Mail

amy.spiller@duke-energy.com
elizabeth.watts@duke-energy.com

burkej@firstenergycorp.com

bojko@carpenterlipps.com
hussey@carpenterlipps.com
allison@carpenterlipps.com

bakahn@vorys.com
smhoward@vorys.com

zac.champ@pcia.com

jeff.jones@puc.state.oh.us
jay.agranoff@puc.state.oh.us

stnourse@aep.com

randall.griffin@aes.com

gregory.dunn@icemiller.com
christopher.miller@icemiller.com
chris.michael@icemiller.com

cassandra.cole@ftr.com

jk2961@att.com

selisar@mwncmh.com

tobrien@bricker.com

Via Regular U.S. Mail:

Dylan T. DeVito
Zayo Group, LLC
1805 29th Street, Suite 2050
Boulder, CO 80301

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV
2015 APR -2 PM 4:08

In the Matter of the Adoption of Chapter)
4901:1-3 Ohio Administrative Code,)
Concerning Access to Poles, Ducts, Conduits,)
and Rights-of-Ways by Public Utilities)

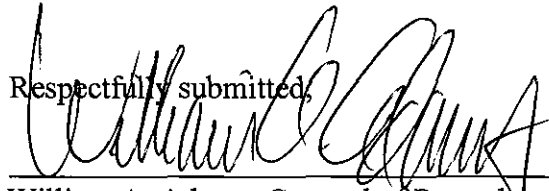
Case No. 13-579-AU-ORD

PUCO

**MOTION TO EXTEND TARIFF AMENDMENT FILING DATE OF
THE OHIO RURAL BROADBAND ASSOCIATION, INC.**

Pursuant to Rule 4901:1-12, Ohio Administrative Code, the Ohio Rural Broadband Association, Inc. ("ORBA")¹ moves the Public Utilities Commission of Ohio to extend the tariff amendment filing deadline to on or before June 1, 2015, for the reasons set forth in the attached memorandum in support.

Respectfully submitted,



William A. Adams, Counsel of Record
BAILEY CAVALIERI LLC
10 West Broad Street, Suite 2100
Columbus, OH 43215-3422
(614) 229-3278 (telephone)
(614) 221-0479 (fax)
William.Adams@baileycavalieri.com
Attorneys for Ohio Rural Broadband Association, Inc.

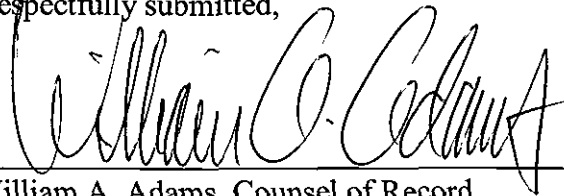
¹ The Ohio Rural Broadband Association, Inc. consists of the following member companies: Arcadia Telephone Company, Arthur Mutual Telephone Company, Ayersville Telephone Company, Bascom Mutual Telephone Company, Benton Ridge Telephone Company, Buckland Telephone Company, Chillicothe Telephone Company, Columbus Grove Telephone Company, Conneaut Telephone Company dba GreatWave Communications, Continental Telephone Company, Doylestown Telephone Company, Farmers Mutual Telephone Company, Fort Jennings Telephone Company, Germantown Independent Telephone Company, Glandorf Telephone Company, Kalida Telephone Company, Inc., Little Miami Communications Corporation, McClure Telephone Company, Middle Point Home Telephone Company, Minford Telephone Company, New Knoxville Telephone Company, Oakwood Telephone Company, Orwell Telephone Company, Ottoville Mutual Telephone Company, Pattersonville Telephone Company, Ridgeville Telephone Company, Sherwood Mutual Telephone Association, Sycamore Telephone Company, Telephone Service Company, Vanlue Telephone Company, Vaughnsville Telephone Company, and Wabash Mutual Telephone Company.

MEMORANDUM IN SUPPORT

ORBA seeks an extension for its members to file applications to amend their tariffs because they need additional time to prepare the calculations for the tariff amendments. The 2014 data required to prepare the tariff amendments may not be available until the deadline for member companies to file their 2014 annual reports, which is April 30, 2015. Many of the member companies use the same accounting firm and the 2014 numbers may not be available until just before the April 30, 2015 annual report deadline. The current May 1 deadline to file tariff amendments causes an undue burden to complete the required calculations and prepare the tariffs. The ORBA members do not have the resources to calculate the pole attachment rates in as little as one day and file the tariffs. An extension to on or before June 1, 2015 will provide adequate time to prepare the calculations using 2014 data and file the tariffs.

ORBA respectfully requests that the tariff filing deadline be extended to June 1, 2015.

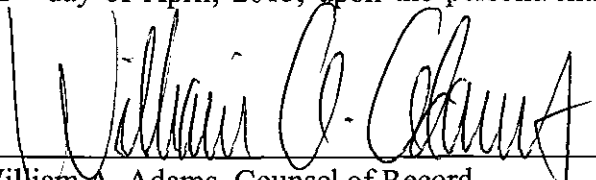
Respectfully submitted,



William A. Adams, Counsel of Record
BAILEY CAVALIERI LLC
10 West Broad Street, Suite 2100
Columbus, OH 43215-3422
(614) 229-3278 (telephone)
(614) 221-0479 (fax)
William.Adams@baileycavalieri.com
Attorneys for Ohio Rural Broadband Association, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing *Motion to Extend Tariff Amendment Filing Date of The Ohio Rural Broadband Association, Inc.* was served via electronic mail or by regular U.S. Mail this 2nd day of April, 2015, upon the persons/entities listed below.



William A. Adams, Counsel of Record
Attorney for Ohio Rural Broadband Association, Inc.

Via Electronic Mail

amy.spiller@duke-energy.com
elizabeth.watts@duke-energy.com

burkej@firstenergycorp.com

bojko@carpenterlipps.com
hussey@carpenterlipps.com
Allison@carpenterlipps.com

bakahn@vorys.com
smhoward@vorys.com

zac.champ@pcia.com

jeff.jones@puc.state.oh.us
jay.agranoff@puc.state.oh.us

stnourse@aep.com

randall.griffin@aes.com

gregory.dunn@icemiller.com
christopher.miller@icemiller.com
chris.michael@icemiller.com

cassandra.cole@ftr.com

jk2961@att.com

selisar@mwncmh.com

tobrien@bricker.com

Via Regular U.S. Mail:

Dylan T. DeVito
Zayo Group, LLC
1805 29th Street, Suite 2050
Boulder, CO 80301