

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review)	
of Ohio Adm. Code Chapter 4901:1-6,)	Case No. 14-1554-TP-ORD
Telephone Company Procedures and)	
Standards.)	

**MOTION FOR EXTENSION OF TIME TO FILE COMMENTS
AND REPLY COMMENTS
AND MEMORANDUM IN SUPPORT OF THE OHIO TELECOM ASSOCIATION**

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SEPTEMBER 24, 2015

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OF THE OHIO TELECOM ASSOCIATION**

Pursuant to Rule 4901-1-12 and 4901-1-13, Ohio Administrative Code (O.A.C.), the Ohio Telecom Association ("OTA") on behalf of its member companies, submits to the Public Utilities Commission of Ohio ("Commission") this Motion for Extension of Time to File Comments and Reply Comments. Initial comments in this proceeding are currently scheduled to be filed on October 6, 2015 with reply comments due to be filed on October 20, 2015.

Respectfully, the OTA hereby requests that the due date for comments be extended to October 26, 2015, with reply comments extended to November 9, 2015. The reasons for this motion are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

/s/ Scott E. Elisar

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MEMORANDUM IN SUPPORT

On September 23, 2015, the Commission issued an Entry in this case. In the Entry, the Commission provided draft rules to implement the statutory changes that were enacted in Am. Sub. House Bill 64 (H.B.64) of the 131st Ohio General Assembly and requested that all interested parties file initial comments and reply comments on the proposal by October 6, 2015 and October 20, 2015, respectively.

H.B. 64 also required the Commission to adopt a novel procedure to implement the new legal requirements. Due to the complexity and importance of the issues, additional time is required so that the parties may be able to review and comment on the legal and policy issues raised by the proposed rules.

For the reasons stated above, the OTA requests that the due date for initial comments be extended to October 26, 2015 and reply comments to November 9, 2015.

Respectfully submitted,

/s/ Scott E. Elisar
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CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion for Extension of Time to File Comments and Reply Comments and Memorandum in Support of the Ohio Telecom Association* was sent by, or on behalf of, the undersigned counsel for Ohio Telecom Association to the following parties of record this 24th day September 2015, *via* electronic transmission.

/s/ Scott E. Elisar

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Summary: Motion for Extension of Time to File Comments and Reply Comments and Memorandum in Support electronically filed by Scott E. Elisar on behalf of Ohio Telecom Association