

Ruth Nettles

From: Keating, Beth [beth.keating@akerman.com]
Sent: Thursday, January 15, 2009 11:26 AM
To: Filings@psc.state.fl.us
Subject: Docket No. 080701-TP
Attachments: 20090115122617797.pdf

Attached for electronic filing in the referenced consolidated Docket, please find Bright House Network's Motion for Extension of Time to Respond to Verizon's Motion to Dismiss and alternative Motion for Summary Final Order. Thank you for your assistance with this filing.

Sincerely,
Beth Keating

A.
Beth Keating
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B. **DOCKET NO. 080701-TP:** Emergency complaint and petition requesting initiation of show cause proceedings against Verizon Florida LLC for alleged violation of Rules 25-4.036 and 25-4.038, Florida Administrative Code, by of Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC.

C. On behalf of Bright House Networks Information Services, LLC and Bright House Networks, LLC

D. Number of Pages: 5

E: BHN's Motion for Extension of Time



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January 15, 2009

VIA ELECTRONIC FILING

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: DOCKET NO. 080701-TP: Emergency complaint and petition requesting initiation of show cause proceedings against Verizon Florida LLC for alleged violation of Rules 25-4.036 and 25-4.038, Florida Administrative Code, by of Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC.

Dear Ms. Cole:

Enclosed for electronic filing, please find a Motion for Extension of Time, submitted on behalf of Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC.

Thank you for your assistance in this matter. Please do not hesitate to contact me if you

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DOCUMENT NUMBER-DATE

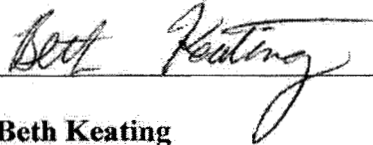
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Ms. Ann Cole
January 15, 2009
Page 2

have any questions whatsoever.

Sincerely,



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Fax: (850) 222-0103

Enclosures

cc: Thomas Wilson
Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: **Emergency complaint and petition requesting initiation of show cause proceedings against Verizon Florida LLC for alleged violation of Rules 25-4.036 and 25-4.038, Florida Administrative Code, by of Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC.**

Docket No. 080701-TP
Filed: January 15, 2009

BRIGHT HOUSE'S MOTION FOR EXTENSION OF TIME TO RESPOND TO VERIZON'S MOTION TO DISMISS AND ALTERNATIVE MOTION FOR SUMMARY FINAL ORDER

Pursuant to Rule 28-106.303(3), Florida Administrative Code, Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC, (jointly referred to herein as "Bright House"), respectfully moves for an extension of time to respond to the Motion to Dismiss and Alternative Request for Summary Final Order (Motion to Dismiss) filed by Verizon Florida LLC on January 12, 2009. As support for this request, Bright House states:

1. The Motion to Dismiss was filed and served on Monday, January 12, 2009. Under Rule 28-106.303(1), Florida Administrative Code, a response to the Motion would be due Monday, January 19, 2009. However, in view of the intervening Martin Luther King, Jr. Holiday, the response due date is the following date, January 20, 2009, in accordance with Rule 28-106.104, Florida Administrative Code.

2. Bright House requests a brief extension of two business days to allow it to file its response on January 22, 2009. Bright House requests this additional time in view of the intervening holiday and the historic inauguration that will take place the following day. These events will make it difficult for Bright House to analyze and prepare an accurate and thorough response to the two alternative requests for relief, as well as the various assertions and counter claims offered in Verizon's motion, by the current due date.

3. Counsel for Bright House has consulted with counsel for Verizon on this request, and has been informed that Verizon does not oppose this request.

Therefore, for all these reasons, Bright House respectfully asks that this request for a brief extension of time be granted.

RESPECTFULLY, submitted this 15th day of January, 2009.

By:  _____

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Attorneys for Bright House

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via US Mail and Electronic Mail* to the persons listed below this 15th day of January, 2009:

| | |
|--|--|
| Dulaney L. O'Roark, III, VP/General Counsel* Verizon Florida, LLC P.O. Box 110, MC FLTC 0007 Tampa, FL 33601 de.oroark@verizon.com | David Christian* Verizon Florida, Inc. 106 East College Ave. Tallahassee, FL 32301-7748 David.christian@verizon.com |
| Charles Murphy, Staff Counsel* Florida Public Service Commission, Office of the General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 rmann@psc.state.fl.us | Beth Salak, Director/Competitive Markets and Enforcement* 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 bsalak@psc.state.fl.us |

By: *Beth Keating*

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