

Ruth Nettles

From: Scobie, Teresa A (TERRY) [terry.scobie@verizon.com]
Sent: Thursday, December 18, 2008 8:49 AM
To: Filings@psc.state.fl.us
Cc: O'Roark, Dulaney L; David Christian; Clark, Demetria Germaine; Beth Keating; marva.johnson@bhnis.com
Subject: Docket No. 080701-TP - Verizon Florida LLC's Motion for Extension of Time to Respond to Complaint
Attachments: 080701 VZ FL Motion for Extension 12-18-08.pdf



The attached filing is submitted in Docket No. 080701-TP on behalf of Verizon Florida LLC by

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The attached .pdf document consists of a total of 4 pages - cover letter (1 page), Motion (2 pages), and Certificate of Service (1 page).

Terry Scobie
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12/18/2008

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December 18, 2008 – VIA ELECTRONIC MAIL

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 Bright House Networks Information Services
(Florida) LLC and Bright House Networks, LLC

Dear Ms. Cole:

Enclosed for filing in the above-referenced matter is Verizon Florida LLC's Motion for
Extension of Time to Respond to Complaint. Service has been made as indicated on
the Certificate of Service. If there are any questions regarding this filing, please contact
me at (678) 259-1449.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Emergency complaint and petition requesting) Docket No. 080701-TP
initiation of show cause proceedings against Verizon) Filed: December 18, 2008
Florida LLC for alleged violation of Rules 25-4.036)
And 25-4.038, Florida Administrative Code, by Bright)
House Networks Information Services (Florida) LLC)
and Bright House Networks, LLC)
_____)

**VERIZON FLORIDA LLC'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Pursuant to Rule 28-206.204(6), F.A.C., Verizon Florida LLC ("Verizon") moves for an extension of time to respond to the complaint filed by Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC ("Bright House") in this docket. As grounds for its motion, Verizon states the following:

1. The complaint was filed and served on December 9, 2008. Under Rule 28-206.204(2), a motion to dismiss would be due on December 29, 2008. Under Rule 28-206.203, Verizon would be entitled to file an answer and would expect to do so by December 29 if it did not file a motion to dismiss.

2. Verizon requests an extension of two weeks, until January 12, 2009, to move to dismiss or answer the complaint. Verizon requests this additional time because the current due date falls during the Christmas holidays, making it difficult for Verizon to complete its investigation of Bright House's allegations and prepare its response by the current due date.

3. Counsel for Verizon has consulted with counsel for Bright House and has been informed that Bright House does not oppose Verizon's request.

Verizon therefore respectfully requests that its motion be granted.

DOCUMENT NUMBER-DATE

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Respectfully submitted on December 18, 2008.

By: s/ Dulaney L. O'Roark III
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Attorney for Verizon Florida LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and/or U.S. mail on December 18, 2008 to:

Staff Counsel
Florida Public Service Commission
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Tallahassee, FL 32399-0850

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s/ Dulaney L. O'Roark III