

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

**Complaint of Choice One Communications of)
Massachusetts Inc., Conversent Communications)
Massachusetts, LLC, CTC Communications Corp.)
And Lightship Telecom, LLC (collectively, "One) D.T.C. 08-3
Communications"), Concerning the Unlawful)
Charges Imposed by Verizon New England Inc.,)
d/b/a Verizon Massachusetts)**

MOTION FOR EXTENSION OF TIME

One Communications Corp., XO Communications Services, Inc., Comcast Phone of Massachusetts, Inc., Freedom Ring Communications, LLC d/b/a BayRing Communications, and Verizon New England Inc. d/b/a Verizon Massachusetts ("Verizon") (collectively "Joint Parties") hereby move the Department for an extension of time, pursuant to 220 CMR § 1.02(5), to submit opening and reply briefs. The current schedule required that the parties file opening briefs on Wednesday, October 22, 2008, and reply briefs one week later, on Wednesday, October 29, 2008. The Joint Parties respectfully request that the briefing schedule be revised as follows:

October 29, 2008 – Due Date for Opening Briefs

November 12, 2008 – Due Date for Reply Briefs

The Joint Parties request this extension of time for the following reasons: The record in this proceeding is voluminous, containing testimony and exhibits from multiple witnesses from four different parties. The transcript of the evidentiary hearing held less than two weeks ago only recently became available, and parties filed their responses to record requests just a few days ago. The petitioning parties and intervenors are working together to

coordinate their briefing and, to the extent possible, minimize duplication in their briefing. In addition, Verizon must address evidence and briefing presented by four other parties. All parties require additional time to maximize their efforts, so as to minimize the amount of unnecessary and burdensome briefing, and to ensure that they address the disputed issues in a manner that fosters development of a full and fair record on which the Department can make its ultimate determination on the petitions.

Accordingly, the Joint Parties respectfully request that the Department grant their motion for an extension of time.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael C. Sloan". The signature is written in a cursive, flowing style.

Michael C. Sloan

On behalf of the Joint Parties

October 20, 2008

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Complaint of Choice One Communications of Massachusetts, Inc., Conversent Communications of Massachusetts, LLC, CTC Communications Corp. and Lightship Telecom, LLC (collectively "One Communications") concerning alleged unlawful charges imposed by Verizon New England Inc., d/b/a Verizon Massachusetts	D.T.C. 08-3
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------

CERTIFICATE OF SERVICE

I hereby certify that on the date given below, a true and complete copy of the following document:

MOTION FOR EXTENSION OF TIME

was served via overnight delivery and electronic mail to:

Catrice C. Williams
Department Secretary
Department of Telecommunications & Cable
One South Station
Boston, MA 02110
catrice.williams@state.ma.us
dtc.efiling@state.ma.us

and by electronic mail and regular mail on the following:

Betsy S. Whittey
Hearing Officer
Department of Telecommunications & Cable
One South Station
Boston, MA 02110
betsy.whittey@state.ma.us

Geoffrey Why
General Counsel
Department of Telecommunications & Cable
One South Station
Boston, MA 02110
geoffrey.why@state.ma.us

Michael Isenberg
Director, Competition Division
Department of Telecommunications & Cable
One South Station
Boston, MA 02110
mike.isenberg@state.ma.us

Kajal Chattopadhyay
Department of Telecommunications & Cable
One South Station
Boston, MA 02110
Kajal.Chattopadhyay@state.ma.us

Harry N. Malone
Counsel for One Communications
Bingham McCutchen LLP
2020 K Street, NW
Washington, D.C. 20006-1806
harry.malone@bingham.com

Russell M. Blau
Counsel for One Communications
Bingham McCutchen LLP
2020 K Street, NW
Washington, D.C. 20006-1806
russell.blau@bingham.com

Alexander W. Moore
Associate General Counsel
Verizon Massachusetts
185 Franklin St., 13th Floor
Boston, MA 02110-1585
alexander.w.moore@verizon.com

Scott Sawyer
Attorney at Law
38 Third St.
Barrington, RI 02806
sasawyer@cox.net

Paula Foley
Regulatory Affairs Counsel
One Communications
220 Bear Hill Road
Waltham, MA 02451
pfoley@onecommunications.com

Eric Krathwohl
Rich May PC
176 Federal St., 6th Floor
Boston, MA 02110-2223
ekrathwohl@richmaylaw.com

Karen M. Potkul
XO Communications Services, Inc.
1601 Trapelo Rd., Ste. 397
Waltham, MA 02451
karen.potkul@xo.com

DATED this 20TH day of October, 2008.

A handwritten signature in black ink, appearing to read "Debra Sloan", written over a horizontal line.

Debra Sloan