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March 25, 2014

Ms. Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
4300 West Saginaw, P.O. Box 30221
Lansing, Michigan 48909

Re: MPSC Case No. U-11756.

Dear Ms. Kunkle:

Enclosed for filing is **Michigan Pay Telephone Association's Consent Motion To Extend The Date For The Mediator's Report and Recommendation**.

Please let me know if you have any questions or concerns regarding these documents.

Sincerely,

Henry T. Kelly

Digitally signed by: Henry T. Kelly
DN: CN = Henry T. Kelly C = US
O = Kelley Drye & Warren LLP
Date: 2014.03.25 13:03:52 -05'00'

Henry T. Kelly

cc: Attached Service List

**STATE OF MICHIGAN**

**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

* * * * * *

| | | |
|---|---|---|
| The Michigan Pay Telephone Association, et al., | ) | |
| | ) | |
| Complainants, | ) | |
| | ) | |
| v. | ) | |
| | ) | |
| Michigan Bell Telephone Company, and GTE North Incorporated, | ) | Case No. U-11756 |
| | ) | |
| | ) | |
| Respondents. | ) | |
| | ) | |
| Complaint Pursuant to Sections 203, 204, and 318 of the Michigan Telecommunications Act to Compel Respondents To Comply with Section 276 of the Federal Communications Act. | ) | |

To: All Parties of Record

**CERTIFICATE OF SERVICE**

STATE OF ILLINOIS )
) ss
COUNTY OF COOK )

I, Henry T. Kelly, an attorney, on oath state that I served a copy of the **Michigan Pay Telephone Association's Consent Motion To Extend The Date For The Mediator's Report and Recommendation** via electronic mail upon the on parties listed on the attached service on March 25, 2014.

Henry T. Kelly

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*Counsel to the Complainants*

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**STATE OF MICHIGAN**
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

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| The Michigan Pay Telephone Association, et al., | ) | |
| | ) | |
| Complainants, | ) | |
| | ) | Case No. U-11756 |
| v. | ) | |
| | ) | |
| Michigan Bell Telephone Company, and Verizon North Incorporated, | ) | |
| | ) | |
| | ) | |
| Respondents. | ) | |
| | ) | |
| Complaint Pursuant to Sections 203, 204, and 318 of the Michigan Telecommunications Act to Compel Respondents To Comply with Section 276 of the Federal Communications Act. | ) | |

**MICHIGAN PAY TELEPHONE ASSOCIATION'S CONSENT MOTION TO EXTEND THE DATE FOR THE MEDIATOR'S REPORT AND RECOMMENDATION**

The Michigan Pay Telephone Association ("MPTA") and the member Complainants, request that the Commission extend from sixty (60) days to one hundred and twenty (120) days the mediation ordered by the Commission in its March 6, 2014 Order Appointing Mediator. Michigan Bell Telephone Company d/b/a AT&T Michigan ("AT&T") and the Commission Staff ("Staff") (Collectively "Parties") consent to the extension of the mediation time. The Complainants state as follows in support of this motion.

1. On March 6, 2014, the Commission issued its Order on Rehearing resolving in part some of the contested issues in the proceeding.

2. Also on March 6, 2014, the Commission entered its Order Appointing Mediator, and designated the Mediator to issue a report to the Commission within 60 days from the date of that Order (May 5, 2014). The Mediator is expected to issue a report on the following issues: 1) the amount of the refund due to the Complainants for the period from April 15, 1997 to March

31, 2001; 2) the amount of the refund due to the Complainants for the period from April 1, 2001 to September 2010; 3) the methodology for calculating interest due on the refund; and 4) the entities or persons entitled to refunds. Order Appointing Mediator at 3.

3. The Parties have conducted a preliminary discussion with the Mediator, and have agreed that the time for the Mediator to issue her recommendations to the Commission should be extended by an additional sixty (60) days, or on or before July 7, 2014.[1]

4. The Parties believe that the extension of time is in the interests of accomplishing the Commission's objectives in the Order Appointing Mediator.

Wherefore, for each of the foregoing reasons, the Michigan Pay Telephone Association and the member Complainants respectfully request that the Commission extend the date for the Mediator to file her recommendations and report to July 7, 2014, which is an additional sixty (60) days, as extended by the July 4, 2014 holiday.

Respectfully submitted,

**Michigan Pay Telephone Association and the Complainants**

Henry T. Kelly

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Date: 2014.03.25 13:02:39 -05'00'

Dated: March 25, 2014

One of the attorneys for the Complainants

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[1] One hundred and twenty days from the Commission's March 6, 2014 Order Appointing Mediator is July 4, 2014. However, because that day is a holiday, the due date for the Mediator's report would be the following business day, July 7, 2014.

Counsel for the Complainants