KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

333 WEST WACKER DRIVE

26TH FLOOR

CHICAGO, IL 60606

(312) 857-7070

NEW YORK, NY
WASHINGTON, DC
LOS ANGELES, CA
STAMFORD, CT
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICE
MUMBAI, INDIA

FACSIMILE
(312) 857-7095
www.kelleydrye.com

HENRY T. KELLY
DIRECT LINE: (312) 857-2350
EMAIL: hkelly@kelleydrye.com

June 17, 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 OU = Kelley Drye and Warren LLP
Date: 2014.06.17 16:04:25 -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 June 17, 2014.

Henry T. Kelly

Digitally signed by: Henry T. Kelly
DN: CN = Henry T. Kelly C = US OU = Kelley Drye and Warren LLP
Date: 2014.06.17 16:07:11 -05'00'

Henry T. Kelly

Leland R. Rosier
CLARK HILL PLC
212 East Grand River Avenue
Lansing, MI 48906

Henry T. Kelly
KELLEY DRYE & WARREN LLP
333 W. Wacker Drive, Suite 2600
Chicago, IL 60606

Counsel to the Complainant

SERVICE LIST – U-11756

MICHIGAN PAY TELEPHONE ASSOCIATION
Leland R. Rosier
CLARK HILL PLC
212 East Grand River Avenue
Lansing, MI 48906
lrrosier@clarkhill.com

VERIZON NORTH, INC.
Michael G. Oliva
LOOMIS, EWERT, PARSLEY, DAVIS & GOTTING PC
124 W. Allegan Street, Suite 700
Lansing, MI 48933
mgoliva@loomislaw.com

Michael A.Holmes
Telecommunications Assoc. of Michigan
600 W. Shiawassee Street
Lansing, MI 48933
holmes.michael@telecommich.org

Albert Ernst
DYKEMA GOSSETT PLLC
201 Townsend Street, Suite 900
Lansing, MI 48933
aernst@dykema.com

Harvey J. Messing
MILLER, CANFIELD, PADDOCK & STONE PLC
1 E. Michigan Avenue, Suite 900
Lansing, MI 48933
messing@millercanfield.com

Lauren Donofrio
MICHIGAN PUBLIC SERVICE COMMISSION
6520 Mercantile Way, Suite 1
Lansing, MI 48911
donofriol@michigan.gov

J. Tyson Covey
MAYER BROWN
71 South Wacker Drive
Chicago, IL 60606
jcovey@mayerbrown.com

Craig A. Anderson
AT&T
225 W. Randolph Street – 25D
Chicago, IL 60606
craig.anderson@att.com

Henry T. Kelly
KELLEY DRYE & WARREN LLP
333 W. Wacker Drive, Suite 2600
Chicago, IL 60606
hkelly@kelleydrye.com

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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 Complainants request that the Commission extend from July 7, 2014 to August 1, 2014 the mediator's report required the Commission's March 6, 2014 Order Appointing Mediator, as modified by the Commission's April 15, 2014 Order extending the original date of the Mediator's Report to July 7, 2014. 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. On April 15, 2014, with the consent of the Parties, the Commission extended the date of the Mediator's Report to July 7, 2014.

4. The Parties have agreed that the time for the Mediator to issue her recommendations to the Commission should be extended to August 1, 2014.

5. 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 August 1, 2014.

Respectfully submitted,

Michigan Pay Telephone Association and the Complainants

Henry T. Kelly

Digitally signed by: Henry T. Kelly
DN: CN = Henry T. Kelly C = US OU = Kelley Drye and Warren LLP
Date: 2014.06.17 16:05:32 -05'00'

Dated: June 17, 2014

One of the attorneys for the Complainants

Leland R. Rosier (P33827)
Clark Hill P.L.C.
212 East Grand River Avenue
Lansing, Michigan 48906
(517) 318-3021
LRRosier@ClarkHill.com

Mr. Henry T. Kelly
Michael R. Dover
Kelley Drye & Warren LLP
333 West Wacker Drive
Chicago, Illinois 60606
(312) 857-7070
HKelly@KelleyDrye.com
MDover@KelleyDrye.com

Counsel for the Complainants