BEFORE THE TENNESSEE REGULATORY AUTHORITY

Petition of Cellco Partnership d/b/a Verizon Wireless For Arbitration under the Telecommunications Act;

Petition for Arbitration of Bell South Mobility, LLC,

Bell South Personal Communications, LLC and : Chattanooga MSA Limited Partnership, collectively : Docket No. 03-00585

d/b/a Cingular Wireless; Petition for Arbitration of

A T& T Wireless PCS, LLC d/b/a AT&T Wireless;

Petition for Arbitration of T-Mobile, USA Inc.,
Petition for Arbitration of Sprint Spectrum LP

d/b/a Sprint PCS

MOTION FOR ONE WEEK EXTENSION FOR FILING OF BRIEFS AND REQUEST FOR EXPEDITED APPROVAL

TO THE TENNESSEE REGULATORY AUTHORITY:

This is a request for extension of the scheduled filing of Briefs and Reply Briefs by one week and for expedited approval.

- 1. Briefs and Reply Briefs are currently due to be filed on April 15 and April 29, 2013, respectively.
- 2. There are currently four active parties to the case, Verizon Wireless, T-Mobile, AT&T Mobility and the RLEC Coalition.
- 3. The RLEC Coalition has engaged in settlement discussions with the other parties and has achieved settlement with Verizon Wireless and T-Mobile, but not completely finalized the documents.
- 4. The RLECs, Verizon Wireless and T-Mobile believe they can finalize their arrangements this week.

- 5. By email dated April 12, 2013, counsel for T-Mobile requested an extension of time to file Briefs in order to finalize the settlement between T-Mobile and the RLECs.
 - 6. On April 13, 2013 Verizon requested the same relief, also by email.
- 7. The RLEC Coalition supports a one week extension for the filing of Main and Reply Briefs for all parties in order to allow the settlement documents to be finalized, such that Briefs and Reply Briefs would now become due on April 22 and May 6, 2013, respectively.
- 8. AT&T Mobility, the other remaining party to this case, has also agreed to the requested extension as a matter of courtesy to the other parties.
- 9. There are numerous reasons supporting the requested extension. It is much more effective to close out the settlement agreements before proceeding with formal pleadings. Finalization of the settlements provides more certainty to the Authority and the parties to definitively know before the filing of final briefs which parties remain involved. Further, the settling parties would prefer to use this week to finalize the settlements, rather than be conflicted by the need to also prepare reply briefs.
- 10. It is believed that the requested one week extension will only minimally impact the TRA's consideration of this docket, if at all.
 - 11. Given that briefs are due today, expedited approval of this request is sought.

WHEREFORE, the parties request their one week extension for the filing of Briefs and Reply Briefs be granted.

Respectfully submitted,

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April 15, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this the 15th day of April, 2013, a true and correct copy of the foregoing document was served by U.S. Mail or e-mail to:

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