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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FLORIDA CABLE  
TELECOMMUNICATIONS ASSOCIATION,  
INC., COX COMMUNICATIONS GULF  
COAST, L.L.C., et. al.

Complainants,

v.

GULF POWER COMPANY,

Respondent.

E.B. Docket No. 04-381

To: Office of the Secretary

Attn.: The Honorable Richard L. Sippel  
Chief Administrative Law Judge

**GULF POWER'S UNOPPOSED MOTION FOR EXTENSION OF  
DEADLINE TO RESPOND TO INITIAL DISCOVERY REQUESTS**

Gulf Power Company ("Gulf Power") pursuant to 47 C.F.R. § 1.205, moves this Court, with the agreement of Complainants' counsel, for a 14-day extension of time to respond to complainants' interrogatories and request for production. In support of this motion, Gulf Power says the following:

1. The parties exchanged initial discovery requests on February 1, 2005. Gulf Power propounded 12 interrogatories and 9 requests for production upon the complainants. The complainants propounded 48 interrogatories and 35 requests for production upon Gulf Power. The original deadline for exchanging responses to initial discovery requests was March 3, 2005.

2. Since the exchange of initial discovery requests, Gulf Power has focused its efforts on getting its consultant started on the comprehensive pole audit being performed for the

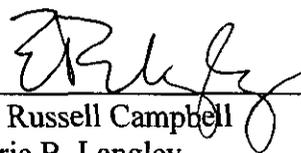
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purposes of this proceeding. Gulf Power has not been able to fully address the 48 interrogatories and 35 requests for production propounded by complainants.

3. The 14-day extension being sought by Gulf Power will not impact any other deadlines in this case. In fact the next deadline is June 14, 2005 -- well after what would be the new deadline for responses to initial discovery on March 17, 2005.

4. Undersigned counsel has consulted with counsel for complainants, and complainants are agreeable to the requested extension (assuming they are allowed the same extension). No party will be prejudiced by the 14-day extension sought in this motion.

Respectfully submitted,



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**Counsel for Respondent**

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Unopposed Motion For Extension Of Deadline To Respond To Initial Discovery Requests has been served upon the following by Electronic Mail and by United States Mail on this the 15<sup>th</sup> day of March, 2005:

<p>Lisa Griffin          Federal Communications Commission          445 12th Street, S.W.          Washington, D.C. 20554  <b>Via E-mail</b></p>	<p>Shiela Parker          Federal Communications Commission          445 12th Street, S.W.          Washington, D.C. 20554  <b>Via E-mail</b></p>
<p>Rhonda Lien          Federal Communications Commission          445 12th Street, S.W.          Washington, D.C. 20554  <b>Via E-mail</b></p>	<p>Marlene H. Dortch, Secretary          Federal Communications Commission          Office of the Secretary          445 12th Street, SW <i>via mail 3/2/05</i>          Washington, D.C. 20554</p>
<p>James Shook          Federal Communications Commission          445 12th Street, S.W.          Washington, D.C. 20554  <b>Via E-mail</b></p>	<p>David H. Solomon          Federal Communications Commission          445 12th Street, S.W.          Washington, D.C. 20554  <i>via mail 3/2/05</i></p>
<p>Director, Division of Record and Reporting          Florida Public Service Commission          2540 Shumard Oak Blvd.          Tallahassee, Florida 32399-0850  <i>via mail 3/2/05</i></p>	<p>Federal Energy Regulatory Commission          Docket Room 1A-209          888 First Street, NE          Washington, D.C. 20426  <i>via mail 3/2/05</i></p>
<p>John D. Seiver          Brian D. Josef          COLE, RAYWID &amp; BRAVERMAN          1919 Pennsylvania Avenue, N.W.          Suite 200          Washington, D.C. 20006  <b>Via E-mail</b></p>	

  
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 OF COUNSEL