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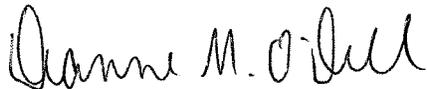
March 23, 2010

Via Electronic FilingJames McNulty, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265Re: Core Communications, Inc. v. AT&T Communications of Pa., LLC and TCG Pittsburgh, Inc., Docket Nos. C-2009-2108186 and C-2009-2108239

Dear Secretary McNulty:

Enclosed for filing please find Core Communications, Inc.'s, AT&T Communications of PA, LLC and TCG Pittsburgh's Joint Motion for Stay and the electronic filing confirmation page with regard to the above-referenced matter. Copies have been served in accordance with the attached Certificate of Service.

Sincerely yours,



Deanne M. O'Dell, Esq.

DMO/lww

Enclosure

cc: Hon. Angela Jones (w/enc)
Cert. of Service (w/enc)

CERTIFICATE OF SERVICE

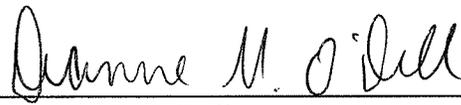
I hereby certify that this day I served a copy of the Joint Motion of Core Communication's, AT&T Communications' and TCG Pittsburgh for Stay upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and First Class Mail

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Dated: March 23, 2010



Deanne M. O'Dell

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Core Communications, Inc.,	:		
<i>Complainant</i>	:		
	:		
v.	:		
	:		
AT&T Communications of PA, LLC	:	Docket No.	C-2009-2108186
	:		
and	:		
	:		
TCG Pittsburgh, Inc.,	:	Docket No.	C-2009-2108239
	:		
<i>Respondents</i>	:		

**JOINT MOTION OF CORE COMMUNICATIONS, INC.,
AT&T COMMUNICATIONS OF PA, LLC, AND TCG PITTSBURGH
FOR STAY**

Pursuant to 52 Pa. Code § 5.103, the undersigned Joint Movants, namely, Core Communications, Inc., (“Core”) and AT&T Communications of PA, LLC, and TCG Pittsburgh, (collectively, “AT&T”), respectfully request that Administrative Law Judge Angela T. Jones (“ALJ Jones”) grant a stay of the above-referenced matter for the reasons provided herein. In support thereof, the Joint Movants aver as follows:

1. Core filed a formal complaint against AT&T on May 19, 2009. In its complaint, Core alleges that AT&T has failed to pay Core for Core’s termination of AT&T’s intrastate telecommunications traffic.
2. AT&T filed its answer on June 9, 2009, and then an Amended Answer on June 18, 2009. A Prehearing Conference was held on September 15, 2009, and a procedural schedule was established. The parties engaged in discovery.
3. On December 8, 2009, AT&T filed a Motion to Dismiss. Core filed its Answer to the Motion to Dismiss on December 28, 2009. AT&T subsequently filed on January 6, 2010, a

Motion to Reply to the Answer of Core and a Reply to Core's Answer, and Core filed an Answer to the Motion on January 26, 2010.

4. Core served its written Direct Testimony on November 16, 2009, AT&T served its written Rebuttal Testimony on December 14, 2009, and Core served its written Surrebuttal Testimony on January 11, 2010.

5. In accordance with ALJ Jones' Order dated February 1, 2010, the previously scheduled evidentiary hearing for February 3, 2010, was converted into an oral argument on AT&T's Motion.

6. On February 26, 2010, Order #6 was entered denying AT&T's Motion to Dismiss regarding certain VoIP-related traffic sent by AT&T after September 2009 on the ground that a material issue of fact exists regarding the traffic. In that same order, AT&T's Motion to Dismiss was granted regarding ISP-bound traffic sent by AT&T to Core.

7. On March 5, 2010, Core filed a Petition for Interlocutory Commission review and Answer to a Material Question, pursuant to 52 Pa. Code § 5.302, regarding the ISP-bound traffic.

8. On March 5, 2010, AT&T filed a Petition for Interlocutory Commission review and Answer to a Material Question, pursuant to 52 Pa. Code § 5.302, regarding the ALJ's ruling on VoIP traffic post-September 2009.

9. Based on the two Material Question petitions, the parties have agreed to request a stay of the proceeding pending further direction from the Commission.

10. A stay of this proceeding will allow the Joint Movants and the Commission to avoid expending unnecessary time and expense in connection with this complaint case when action by the Commission will impact the manner in which this case will proceed.

11. In light of this, the Joint Movants – the only two parties to this proceeding – agree to seek a stay of this proceeding until such time as the Commission issues an order regarding the request for interlocutory review, or until such time as either party, at its sole discretion, requests that the stay be lifted, whichever occurs first.

12. The parties agree to request that the stay of this matter include a stay of both pending and new discovery. More specifically, the parties agree to request that decisions on the Motion to Compel served by AT&T on January 6, 2010, regarding AT&T Set IV and the Motion to Compel served on February 24, 2010, regarding AT&T Set V be held in abeyance.

13. For all of the reasons outlined above, the Joint Movants respectfully request that the ALJ grant an Order staying this matter until such time as the Commission issues an order regarding both of the pending petitions for interlocutory review, or until one of the parties request that the stay be lifted, whichever is earlier.¹

14. The Parties agree to provide a status report on or before May 22, 2010, if the stay is not lifted sooner by its terms.

WHEREFORE, for all the foregoing reasons, Joint Movants respectfully request that Your Honor issue an Order:

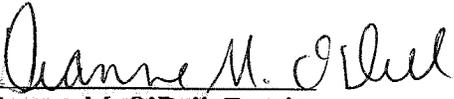
1. Staying the proceeding until such time as the Commission resolves the issues in the aforementioned petitions, or until one of the parties request that the stay be lifted, whichever is earlier.

2. Directing that any answers and any responses to discovery currently outstanding are due within one week after the ALJ issues an Order on the outstanding Motions to Compel;
and

¹ No party is waiving its right to oppose another party's request to lift the stay.

3. Granting such further relief consistent with the foregoing that is deemed reasonable and just.

Respectfully submitted,


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Dated: March 23, 2010