



VIA OVERNIGHT UPS & ELECTRONIC MAIL

July 29, 2011

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 4242

Dear Ms. Massaro:

Enclosed for filing on behalf of RNK Inc. d/b/a RNK Communications ("RNK") and Verizon New England Inc., d/b/a Verizon Rhode Island ("Verizon RI"), please find 10 copies of an Joint Motion to Stay the above captioned docket.

Thank you for your attention to this filing. Should you have any questions regarding this transmittal, please contact me at (781) 613-6119.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael S. Tenore". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael S. Tenore

Enclosures

cc: Alexander Moore (Email)
John Conroy (Email)

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

RNK Inc. d/b/a RNK Telecom)	
)	
v.)	Docket No. 4242
)	
Verizon New England Inc.)	
d/b/a Verizon Rhode Island)	
)	

**JOINT MOTION
TO STAY**

Now comes RNK Inc. d/b/a RNK Communications (“RNK”) and Verizon New England Inc., d/b/a Verizon Rhode Island (“Verizon RI”) (the parties to the Docket 4242, together, the “Parties” or “Movants”), and jointly move pursuant to Commission Rule 1.15 (a) and 1.6(b) that the Commission stay the procedural schedule in Docket 4242 for thirty (30) days in order for the Parties to focus their time and effort to reach a timely final resolution and settlement. As grounds therefore, the Movants state as follows:

ARGUMENT

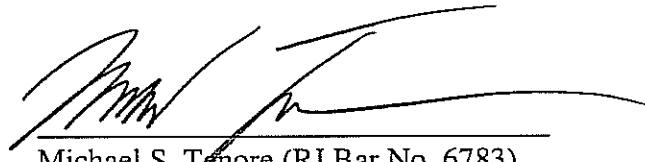
1. In support of this Motion, the Movants represent that they are in advanced settlement discussions and have come to an understanding and framework for settlement. The Movants require time to formalize the terms and incorporate them into a final agreement which they expect could take thirty (30) days. A stay will enable the Movants to bring the necessary resources to these matters without the demands of simultaneously pursuing the Docket.
2. A stay will also enable the Movants to avoid incurring litigation costs that would become unnecessary if the parties were to reach a proposed settlement. Further, a stay at this juncture would potentially save Commission resources as a Motion to Dismiss is currently pending. A stay may avoid these costs and also the Commission’s expenditure of unnecessary time and resources on this matter.
3. Should the Movants reach a settlement prior to the expiration of the requested stay, the Movants will update the Commission and act accordingly. If the parties do not reach a settlement, the stay sought by the Movants will not compromise either Party’s prosecution of this action. The Commission has not yet established a schedule for this case.

CONCLUSION

4. For the reasons stated above, RNK Inc. d/b/a RNK Communications and Verizon New England Inc., d/b/a Verizon Rhode Island respectfully request the Commission grant this Joint Motion.

Respectfully submitted,

RNK, Inc.
By its Attorney,



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Verizon New England Inc., d/b/a Verizon
Rhode Island
By its Attorney,



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(617) 743-2265

Dated: July 29, 2011