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May 24, 2011

RECEIVED

Jeff DeRouen **Executive Director** Kentucky Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, KY 40601

MAY 24 2011

PUBLIC SERVICE COMMISSION

RE:

Express Phone Service, Inc. 's Application for Limited Designation as an

Eligible Telecommunications Carrier

Case No. 2010-00064 110pm

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of Express Phone Service, Inc.'s Motion for Extension of Time.

Please indicate receipt of this filing by placing your file stamp on the extra copy and returning to me via our runner.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

DFB:

Enclosures

113265.136449/726684.1

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

MAY 24 2011

PUBLIC SERVICE COMMISSION

Case No. 2010-00064

APPLICATION OF EXPRESS PHONE SERVICE, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE COMMONWEALTH OF KENTUCKY

IN THE MATTER OF

EXPRESS PHONE SERVICE, INC.'S MOTION FOR EXTENSION OF TIME

Express Phone Service, Inc. ("Applicant"), by its counsel, hereby requests a thirty day extension of time to file its responses to the 39 information requests submitted by the Commission staff on April 27, 2011. As grounds for this motion, Applicant's counsel states that the Applicant is involved in a contested proceeding before the Florida Public Service Commission that will require significant attention prior to June 14, 2011, and may affect Applicant's plans to obtain ETC certification in Kentucky. Staff data request No. 39 refers specifically to the proceeding and asks for orders of the Florida PSC. Presumably, staff seeks any dispositive order that may be relevant to the Kentucky proceeding. At a minimum, a thirty day extension will enable Applicant to file a thorough response to this request.

As this is an uncontested application with no intervenors, an extension will not harm the interests of anyone. Accordingly, Applicant requests a thirty day extension in which to respond to the information requests from the Commission staff.

May 24, 2011

Respectfully submitted,

Douglas F. Brent

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