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PUBLIC SERVICE  
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COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

Ballard Rural Telephone Cooperative Corp., Inc., )  
 et al., Complainants )  
 )  
 vs. )  
 )  
 BellSouth Telecommunications, Inc. d/b/a AT&T )  
 Kentucky Defendant and BellSouth )  
 Telecommunications, Inc. d/b/a AT&T )  
 Kentucky, Third Party Complainant )  
 )  
 vs. )  
 )  
 Halo Wireless, Inc., Third Party Defendant )

Case No. 2011-00199

In the Matter of:

AT&T Corp., Complainant )  
 )  
 vs. )  
 )  
 Mountain Rural Cooperative Corp. and )  
 Thacker-Grigsby Telephone Co., Inc., )  
 Defendants; )

Case No. 2013-00392

In the Matter of:

South Central Telcom, LLC, Complainant )  
 )  
 vs. )  
 )  
 BellSouth Telecommunications, Inc. d/b/a )  
 AT&T Kentucky, Defendant )

Case No. 2006-00448

In the Matter of:

Petition of Cumberland Cellular, Inc. d/b/a Duo	)	
County Telecom for Arbitration of Certain Terms	)	
and Conditions of Proposed Interconnection	)	
Agreement with BellSouth Telecommunications,	)	Case No. 2012-00529
Inc., d/b/a AT&T Kentucky, Pursuant to the	)	
Communications Act of 1934, as Amended by the	)	
Telecommunications Act of 1996	)	

In the Matter of:

Cumberland Cellular, Inc., d/b/a Duo County	)	
Telecom, Complainant	)	
	)	
v.	)	Case No. 2013-00168
	)	
BellSouth Telecommunications, Inc., d/b/a AT&T	)	
Kentucky, Defendant	)	

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**Joint Motion To Suspend August 27, 2014 Procedural Schedule**

Ballard Rural Telephone Cooperative Corporation, Inc., Brandenburg Telephone Company, Inc., Duo County Telephone Cooperative Corporation, Inc., Foothills Rural Telephone Cooperative Corporation, Inc., Gearheart Communications Company, Inc. d/b/a Coalfields Telephone Company, Highland Telephone Cooperative, Inc., Logan Telephone Cooperative, Inc., Mountain Rural Telephone Cooperative Corporation, Inc., North Central Telephone Cooperative Corporation, Peoples Rural Telephone Cooperative Corporation, Inc. South Central Rural Telephone Cooperative Corporation, Inc., Thacker-Grigsby Telephone Company, Inc., West Kentucky Rural Telephone Cooperative Corporation., Inc. d/b/a WK&T, South Central Telcom LLC, Cumberland Cellular, Inc., d/b/a Duo County Telecom, North Central Communications, BellSouth Telecommunications, LLC d/b/a AT&T Kentucky (“AT&T

Kentucky”), and AT&T Corp. (collectively the “Movants”) jointly and respectfully move the Public Service Commission of Kentucky to suspend the August 27, 2014 Procedural Order entered by the Commission in Case No. 2011-00199. In support of their Joint Motion the Movants state:

1. On October 9, 2014 the Movants entered into a Settlement Agreement that, *inter alia*, settles five actions<sup>1</sup> currently pending before the Commission. Among the proceedings that are resolved by the October 9, 2014 Settlement Agreement is Case No. 2011-00199.

2. On October 10, 2014 the Movants filed the Settlement Agreement with the Commission, requested the Commission approve the agreement, and requested that upon such approval, the Commission dismiss the five actions that are the subject of the Settlement Agreement.

3. The Commission’s August 27, 2014 Order in Case No. 2011-00199 requires that the Movants on or before November 17, 2014 file “initial requests for information” and respond to initial requests for information previously filed.

4. The Settlement Agreement, if approved, moots the need for the discovery in Case No. 2011-00199 (as well as the other four proceedings that are the subject of the Settlement Agreement).

5. The previously filed requests for information will require substantial time, expense, and other resources to be expended by the Movants to answer. Given the scope of the information sought, and the additional deadlines imposed by the August 27, 2014 order, the

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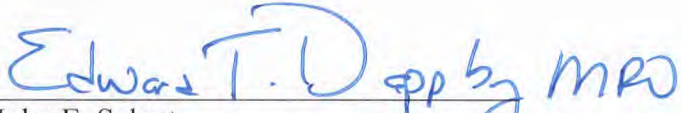
<sup>1</sup> The proceedings that are being settled are: Case No. 2006-00448; Case No. 2011-00199; Case No. 2012-00529; Case No. 2013-00168; Case No. 2013-00392.

Movants cannot await a ruling on their motion to approve the Settlement Agreement to begin responding to the discovery requests. Requiring the Movants to undertake such effort and expense in light of their proposed settlement would be, respectfully, unreasonable. Moreover, to the extent the Movants disagree concerning the relevancy to the proceedings of the information sought by the pending discovery, or the Movants have other objections to the pending discovery requests, or the Movants seek confidential treatment for information that otherwise would be produced in response to the pending discovery requests, the Commission would be needlessly required to expend its scarce resources.

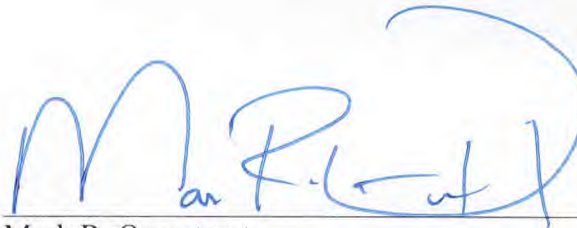
**WHEREFORE**, the Movants respectfully and jointly request that the Public Service Commission of Kentucky enter an Order:

- (a) Suspending the Commission's August 27, 2014 Order establishing a procedural schedule in Case No. 2011-00199 pending the Commission's approval of the Settlement Agreement; and
- (b) Granting the Movants all further relief to which they may appear entitled.

Respectfully submitted,

  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by U.S. mail this 10<sup>th</sup> day of October, 2014, on the following individuals:

**HALO WIRELESS, INC.:**

Linda Payne  
Chapter 7 Bankruptcy Trustee  
Halo Wireless, Inc.  
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*Counsel to AT&T Kentucky*