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VIA FEDEX

May 21, 2014

Mr. Jeffrey Derouen  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602

RECEIVED

MAY 22 2014

PUBLIC SERVICE  
COMMISSION

RE: In the Matter of: New Cingular Wireless Application for CPN  
East Point Site (Case No.: 2014-00088)

Dear Mr. Derouen:

Enclosed please find for filing with the Commission in the above-referenced case an original and ten (10) copies of New Cingular Wireless PCS, LLC's ("AT&T Mobility") Motion for Seven Day Extension of Time to Respond to Appalachian Wireless Motion to Intervene.

Thank you and please do not hesitate to contact me if you have any questions or concerns.

Sincerely,  
David A. Pike  
Attorney for AT&T Mobility  
Pike Legal Group, PLLC

RECEIVED

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

MAY 22 2014

PUBLIC SERVICE  
COMMISSION

In the Matter of:

THE APPLICATION OF )  
NEW CINGULAR WIRELESS PCS, LLC )  
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC ) CASE NO.: 2014-00088  
CONVENIENCE AND NECESSITY TO CONSTRUCT )  
A WIRELESS COMMUNICATIONS FACILITY )  
IN THE COMMONWEALTH OF KENTUCKY )  
IN THE COUNTY OF FLOYD )

SITE NAME: EAST POINT

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**APPLICANT'S MOTION FOR SEVEN DAY EXTENSION OF TIME TO RESPOND TO  
APPALACHIAN WIRELESS MOTION TO INTERVENE**

Applicant New Cingular Wireless PCS LLC ("AT&T Mobility"), by counsel, makes a Motion for a Seven Day Extension of Time to respond to the Motion to intervene of Appalachian Wireless in the within proceeding. In support of this Motion, AT&T Mobility respectfully provides and states the following information:

1. East Kentucky Network, LLC d/b/a Appalachian Wireless ("Appalachian Wireless") has filed a Motion to Intervene in this proceeding as received by the Kentucky Public Service Commission on or about May 19, 2014 and has filed companion Motions to Intervene in several other AT&T Mobility cases for proposed tower sites at different locations in various counties.

2. 807 K.A.R. 5:001 requires "unless the Commission orders otherwise" that AT&T Mobility file any Response to such Motion "... no later than seven (7) days from the date of filing of a motion."

3. AT&T Mobility requests a seven day extension of time through June 2, 2014 to

respond in writing to such Motion to Intervene, because of: (a) the complexity of the issues to be addressed, (b) that multiple tower sites are involved in companion Motions to Intervene, (c) because of AT&T Mobility's intent to present certain factual evidence in response in addition to legal argument, and (d) that the Memorial Day Holiday Weekend falls in the original seven (7) day period.

4. AT&T Mobility maintains that it having sufficient opportunity to prepare and file a thorough Response to the Motion to Intervene will allow the Commission and its Staff to be better informed on the relevant issues in advance of any Informal Conference which is scheduled. Also, AT&T Mobility recognizes 807 K.A.R. 5:001 would allow Appalachian Wireless five days to file a Reply to the Response. Having the record appropriately developed prior to an Informal Conference on the issues is in the interest of all parties as well as the public interest.

5. AT&T Mobility timely files this Motion in advance of expiration of the original seven day deadline for a Response pursuant to 807 K.A.R. 5:001.

**WHEREFORE,** Applicant respectfully requests the Kentucky Public Service Commission:

- (a) accept this Motion for filing;
- (b) grant the requested Seven Day extension of time through June 2, 2014 for Response to the Appalachian Wireless Motion to Intervene;
- (e) to grant Applicant any other relief to which it is entitled.

## **CERTIFICATE OF SERVICE**

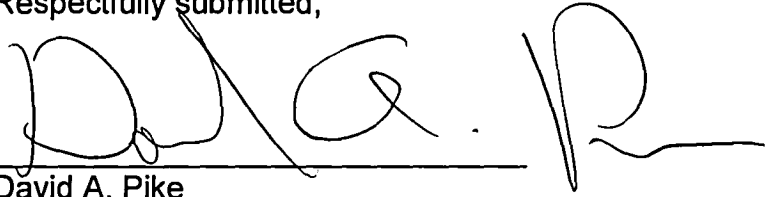
The undersigned hereby certifies the within was mailed by U.S. Postal Service first class mail postage prepaid to the following on this 21 day of MAY 2014:

William S. Kendrick  
Francis, Kendrick & Francis  
P.O. Box 268  
Prestonsburg, Kentucky 41653  
(Attorney for East Kentucky Network, LLC, d/b/a Appalachian Wireless)

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Executive Director, PSC  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, KY 40602

Richard G. Raff  
Jeb Pinney  
Division of General Counsel  
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Respectfully submitted,



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and



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