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VIA FEDEX AND E-MAIL

Mr. William F. Feldman
Assistant Director
Division of Filings
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

**Re: Request by Pilgrim Telephone, Inc., for Withdrawal of Its
Tariff for Resale of Common Carrier Service as a Value
Added Common Carrier in the Commonwealth of Kentucky**

Dear Mr. Feldman:

Pilgrim Telephone, Inc. (Pilgrim) (Utility ID Nos. 22253004, 33353004, and 5300400) currently has in effect a tariff for the resale of common carrier service as a value added common carrier, applying to intrastate resale common carrier communications services between points in the Commonwealth of Kentucky (Tariff ID No. TFS1999-00638). The tariff was approved by the Commission effective June 9, 1999. Approval of the tariff by the Commission constitutes a certificate of authority to conduct operations in the Commonwealth.

Pilgrim hereby requests that its tariff be withdrawn by the Commission. The principal reason for this request is that Pilgrim is not providing any services pursuant to the tariff to subscribing customers in Kentucky and does not have any plans to do so.

It is my understanding that any requirements regarding notification of customers, return of customer deposits, or other similar actions that may apply in cases in which the tariff of a telecommunications carrier is withdrawn do not apply with respect to Pilgrim's request because Pilgrim does not have any customers who subscribe to services pursuant to Pilgrim's tariff. Pilgrim does not provide local exchange services in Kentucky; moreover, any use of Pilgrim's interexchange services by customers in Kentucky is initiated only on a casual access basis. Therefore, no subscription is involved for any services provided by Pilgrim, and Pilgrim does not maintain any ongoing service provider-customer relation-

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ship with any user of its services in the Commonwealth. Pilgrim thus does not have any customers who could be affected by the withdrawal of Pilgrim's tariff; no customers have submitted any cash deposits to Pilgrim in connection with Pilgrim's provision of services; there are no customers who could be transferred to another provider of telecommunications services; and there are no customers to whom Pilgrim could provide notice of the withdrawal of Pilgrim's tariff.

It is also my understanding that, if the Commission grants Pilgrim's request and withdraws Pilgrim's tariff, Pilgrim will still be required to file with the Commission, not later than March 31, 2005, a report of its gross earnings or receipts derived from interstate business and an annual report applicable to calendar year 2004. Pilgrim hereby indicates its intention to comply with these filing requirements. Finally, it is my understanding that, upon the withdrawal of Pilgrim's tariff and Pilgrim's completion of the filing obligations described above, Pilgrim will not be subject to any further requirements in Kentucky.

Please do not hesitate to contact me if there are any questions, or if any additional information is required.

Respectfully submitted,



John Cimko
Counsel for Pilgrim Telephone, Inc.

cc: Ms. Renee C. Smith
Tariff Branch
Division of Filings
Kentucky Public Service Commission
(via e-mail)