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May 6, 2004

Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
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MAY 06 2004

PUBLIC SERVICE
COMMISSION

RE: Administrative Case 382

Dear Ms. O'Donnell:

Enclosed for filing in the above-referenced case is AT&T Communications of the South Central States, LLC's Motion to Amend Procedural Schedule. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me the enclosed, self-addressed stamped envelope.

Sincerely yours,



Douglas F. Brent

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MAY 06 2004

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INQUIRY INTO THE DEVELOPMENT OF)
DEAVERAGED RATES FOR UNBUNDLED) ADMINISTRATIVE
NETWORK ELEMENTS) CASE NO. 382

MOTION TO AMEND PROCEDURAL SCHEDULE

AT&T Communications of the South Central States, LLC, by its undersigned counsel and pursuant to the Commission's Order dated April 16, 2004, hereby requests an amendment to the procedural schedule to permit the receipt of the UNE cost model, studies and supporting exhibits prepared by Kentucky ALLTEL, Inc. ("ALLTEL") prior to the filing of parties' data requests. Good cause exists to grant this motion, as shown below.

ALLTEL's cost model and related exhibits were filed with motions for confidential treatment. At the time the material was filed there was no agreement whereby intervenors could obtain the information. This was in contrast to the procedure used by BellSouth earlier in this case.¹ Consequently, only the Commission received the confidential material. AT&T needs access to this material in order to prepare data requests. ALLTEL has agreed to furnish the material to AT&T subject to a protective agreement between the parties. However, ALLTEL has advised AT&T that due to the volume of materials to be reproduced, AT&T may not have the complete set of

¹ In the initial phase of this case, BellSouth's counsel circulated a proposed protective agreement to all parties, including AT&T, more than two weeks before filing its cost study. See letter from Creighton Mershon to all parties of record dated September 20, 2000. ALLTEL was not a party to this proceeding in 2000.

documents until approximately five days after the agreement is executed. Accordingly, AT&T requests a two week extension to permit AT&T to receive the confidential material from ALLTEL, review it, and complete its data requests. An equivalent extension is proposed for ALLTEL's responses and for all parties' comments.

Counsel for AT&T has contacted other parties who have recently intervened in this case and asserts that no party will be prejudiced by a two week extension. In addition, counsel for AT&T has conferred with counsel to ALLTEL and is advised that ALLTEL is not opposed to the extension AT&T seeks. AT&T proposes that the current schedule be modified to add two weeks to each date on the current schedule, as follows:

1. By May 21, 2004, Intervenors and Commission Staff may file data requests for ALLTEL.
2. By June 11, 2004, ALLTEL shall file responses to data requests.
3. By June 25, 2004, any party to this proceeding shall file comments on ALLTEL's filings.
4. By July 9, 2004, any party including ALLTEL that desires a public hearing in this matter shall file a written request for a hearing.

For the reasons shown above, AT&T requests that the Commission enter an order modifying the procedural schedule as shown in this motion.

Respectfully submitted,



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