

S T O L L | K E E N O N | & | P A R K | L L P

2650 AEGON CENTER | 400 WEST MARKET STREET | LOUISVILLE, KENTUCKY 40202-3377  
(502) 568-9100 PHONE | (502) 568-5700 FAX | WWW.SKP.COM

DOUGLAS F. BRENT  
502-568-5734  
Brent@skp.com

May 6, 2004

Elizabeth O'Donnell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40601

**RECEIVED**

MAY 07 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

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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MAY 07 2004

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.<sup>1</sup> 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

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<sup>1</sup> 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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C. Kent Hatfield  
Douglas F. Brent  
STOLL, KEENON & PARK, LLP  
2650 AEGON Center  
400 West Market Street  
Louisville, Kentucky 40202  
(502) 568-9100

Martha Ross-Bain  
Senior Attorney  
AT&T  
Suite 8100  
1200 Peachtree Street, N.E.  
Atlanta, GA 30309

**ADMINISTRATIVE CASE 382  
SERVICE LIST**

William Adkinson  
Sprint Communications Company LP  
3065 Cumberland Circle, SE  
Mailstop GAATLD0602  
Atlanta, GA 30339

Jonathon N. Amlung  
1000 Republic Building  
420 W. Muhammad Ali Boulevard  
Louisville, KY 40202

Gene Baldrate  
VP – Regulatory Affairs  
Cincinnati Bell Telephone Co  
201 East Fourth Street  
Cincinnati, OH 45201-2301

Russell L. Blau  
Swidler, Berlin, Shereff & Friedman  
3000 K Street, N.W. Suite 300  
Washington, DC 20007

Joshua L. Bobeck  
Swidler, Berlin, Sheref & Friedman  
3000 K Street, N.W. Suite 300  
Washington, DC 20007

Dorothy J. Chambers  
BellSouth Telecommunications, Inc.  
601 W. Chestnut St., Room 410  
Louisville, KY 40232

Ann Louise Cheuvront  
1024 Capital Center Drive  
Frankfort, KY 40601-8204

Greg Coker  
Kentucky AllTel, Inc.  
P.O. Box 1650  
Lexington, KY 40588-1650

Julie L. Davis  
MCIMetro Access Transmission  
Services, LLC  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328

Joseph E. Donovan  
O'Keefe, Ashenden, Lyons & Ward  
30 North LaSalle, Suite 4100  
Chicago, IL 60602

Noelle M. Holladay  
Wyatt, Tarrant & Combs, LLP  
250 West Main Street, Suite 1600  
Lexington, KY 40507-1746

John N. Hughes  
124 West Todd Street  
Frankfort, KY 40601

Brent E. McMahan  
VP – Regulatory and Government  
Affairs  
Network Telephone Corporation  
3300 N. Pace Boulevard  
Pensacola, FL 32501

Holland N. McTyeire, V  
Greenebaum Doll & McDonald, PLLC  
3300 National City Tower  
101 South Fifth Street  
Louisville, KY 40202-3197

Mark Romito  
Cincinnati Bell Telephone Company  
201 East Fourth Street  
P.O. Box 2301  
Cincinnati, OH 45201-2301

Richard M. Sullivan  
Conliffe, Sandmann & Sullivan  
2000 Waterfront Plaza  
325 W. Main Street  
Louisville, KY 40202

Jeffrey J. Yost  
Jackson Kelly, PLLC  
175 East Main Street  
Suite 500, P.O. Box 2150  
Lexington, KY 40595-000

Kennard B. Woods, Kennard  
MCI  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328

Rob McMillin  
New Edge Network, Inc..  
3000 Columbia House Boulevard,  
Suite 106  
Vancouver, WA 98661-2969

James H. Newberry, Jr.  
Wyatt, Tarrant & Combs, LLP  
250 West Main Street, Suite 1600  
Lexington, KY 40507-1746

Martha N. Ross-Bain  
AT&T Communications of the South  
Central  
States, LLC  
1200 Peachtree Street, N.E., Suite  
8100  
Atlanta, GA 30309

Charles E. Watkins  
Covad Communications Company  
1230 Peachtree Street, N.E., 19<sup>th</sup>  
Floor  
Atlanta, GA 30328

Carol Keith  
NuVox Communications, Inc.  
16090 Swingley Ridge Road, Suite 500  
Chesterfield, MO 63017