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September 28, 2004

**VIA HAND DELIVERY**

Ms. Elizabeth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602

Drop Box  
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SEP 28 2004

PUBLIC SERVICE  
COMMISSION

RE: An Inquiry Into the Development of Deaveraged Rates for  
Unbundled Network Elements, Administrative Case No. 382

Dear Ms. O'Donnell:

Enclosed for filing please find an original and eleven (11) copies of the  
Joint Motion for an Extension filed by Kentucky ALLTEL, Inc. and NuVox  
Communications, Inc.

Please date stamp the extra copy and return to me.

Thank you for your assistance in this matter. If you have any questions,  
please do not hesitate to call.

Sincerely,

WYATT, TARRANT & COMBS, LLP

James H. Newberry, Jr.

Enclosure

Joint Motion (original and 11 copies)

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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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SEP 28 2004

PUBLIC SERVICE  
COMMISSION

In the Matter of:

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

JOINT MOTION FOR AN EXTENSION

Kentucky ALLTEL, Inc. ("Kentucky ALLTEL") and NuVox Communications, Inc. ("Nuvox") state as follows in support of their Joint Motion for an Extension:

1. On July 23, 2004, the Kentucky Public Service Commission ("Commission") issued an Order establishing the following procedural schedule:

- a. October 1, 2004 - Prefiled Direct Testimony
- b. November 1, 2004 - Prefiled Rebuttal Testimony
- c. November 30, 2004 - Formal Hearing

2. Since the Commission's July Order, Nuvox has submitted and ALLTEL has responded to informal and formal discovery. Additionally, Nuvox is in the process of developing additional data requests with respect to the data request responses that were filed by Kentucky ALLTEL on September 20, 2004.

3. In order to prepare meaningful direct testimony, the parties anticipate that they will need additional time to explore the parties' further discovery concerns.

4. Additionally, one of Kentucky ALLTEL's witnesses has a conflict with the November 30, 2004 hearing date, and due to the specialized subject matter, Kentucky ALLTEL does not anticipate that assignment of this area of testimony to another person will be feasible.

5. For these reasons, Kentucky ALLTEL and Nuvox request that the current procedural schedule be amended to reflect the following dates:

- a. October 25, 2004 - Prefiled Direct Testimony
- b. November 23, 2004 - Prefiled Rebuttal Testimony
- c. December 15, 2004 - Formal Hearing


6. Alternatively, Kentucky ALLTEL and NuVox request that the Commission enter an order granting an indefinite extension for the filing of direct testimony currently due on October 1, 2004. Kentucky ALLTEL and NuVox are in discussions concerning discovery and expect they would be ready to propose an amended procedural schedule within twenty days. No harm will result from this request as Nuvox and Kentucky ALLTEL are the only active parties participating in this proceeding.

WHEREFORE, Kentucky ALLTEL and Nuvox request that the Commission grant their Joint Motion for an Extension and all other necessary and proper relief to which they may be entitled.

Dated this 28<sup>th</sup> day of September, 2004.

Respectfully submitted,

**KENTUCKY ALLTEL, INC.**

By: 

James H. Newberry, Jr.

Noelle M. Holladay

Wyatt, Tarrant & Combs, LLP

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**NUVOX COMMUNICATIONS, INC.**

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the parties shown on the attached list via regular U.S. mail postage prepaid this 28<sup>th</sup> day of September.

James H. Newberry, Jr.  
James H. Newberry, Jr.

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