

Dinsmore & Shohl LLP
ATTORNEYS

Holly C. Wallace
502-540-2309
holly.wallace@dinslaw.com

February 23, 2006

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FEB 23 2006

PUBLIC SERVICE
COMMISSION

via Hand Delivery
Ms. Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

Re: *Ballard Rural Telephone v. Jackson Purchase Rural Electric Cooperative Corporation, Case No. 2004-00036*

Dear Ms. O'Donnell:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky (the "Commission") is one original and ten (10) copies of Ballard Rural Telephone Cooperative Corporation Inc.'s Motion to Continue the Hearing Scheduled for March 15, 2006 in the above-styled case.

Very truly yours,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk

Enclosure

cc: John E. Selent, Esq. (w/o enclosure)

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**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

FEB 23 2006

PUBLIC SERVICE
COMMISSION

In the Matter of:

**BALLARD RURAL TELEPHONE
COOPERATIVE CORPORATION, INC.**

v.

JACKSON PURCHASE ENERGY CORPORATION

)
)
) **CASE NO. 2004-00036**
)
)
)

**MOTION TO CONTINUE THE HEARING SCHEDULED
FOR MARCH 15, 2006**

Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission") to continue the hearing scheduled for March 15, 2006, to the week of April 24, 2006 or the month of June, 2006 subject to the Commission's convenience. In support of its motion, Ballard Rural states as follows.

The central issue at dispute in this case, the availability of cable television tariff rates to telephone companies, is of great importance to Ballard Rural. Ballard Rural appreciates the time the Commission has devoted to this case and looks forward to participating in the formal hearing. Nonetheless, Ballard Rural finds itself in a position where it needs to move to continue the hearing. It is presently involved in interconnection negotiations with several Commercial Mobile Radio Service ("CMRS") and competitive local exchange carriers, and other time sensitive business issues. Accordingly, Ballard Rural is presently in the midst of multiple interconnection negotiations which require the time and attention of both Harlon Parker and Randy Grogan, the two individuals who submitted pre-filed direct testimony on behalf of Ballard

Rural, as well as the implementation of time sensitive business plans. Therefore, Ballard Rural would appreciate the hearing being postponed.

Counsel to Ballard Rural discussed this motion with Melissa Yates, counsel to Jackson Purchase Rural Electric Cooperative Corporation, on February 22, 2006 who stated Jackson Purchase does not object to Ballard Rural's motion. Accordingly, Ballard Rural respectfully requests that the Commission continue the hearing scheduled for March 15, 2006 until the week of April 24, 2006 or the month of June 2006, subject to the Commission's docket and availability of Commission staff.

Respectfully submitted,



John E. Selent
Holly C. Wallace
Dinsmore & Shohl LLP
1400 RNC Plaza
500 West Jefferson Street
Louisville, KY 40202
(502) 540-2300
(502) 585-2207 (facsimile)
john.selent@dinslaw.com
holly.wallace@dinslaw.com

**COUNSEL TO BALLARD
RURAL TELEPHONE
COOPERATIVE
CORPORATION, INC.**

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was served, via United States mail, first class, postage pre-paid, this 23rd day of February, 2006 on the following:

W. David Denton
Melissa D. Yates
Denton & Keuler, LLP
555 Jefferson Street
P.O. Box 929
Paducah, KY 42002-0929

G. Kelly Nuckols
President & CEO
Jackson Purchase Energy
Corporation
2900 Irvin Cobb Drive
Paducah, KY 42002-4030



**COUNSEL TO BALLARD RURAL
TELEPHONE COOPERATIVE
CORPORATION, INC.**

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