

**Dinsmore & Shohl** LLP  
ATTORNEYS

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September 4, 2007

**VIA HAND DELIVERY**

Hon. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
P. O. Box 615  
Frankfort, KY 40601

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SEP 04 2007

PUBLIC SERVICE  
COMMISSION

**Re: *In the Matter of: Ballard Rural Telephone Cooperative Corporation, Inc. v. Jackson Purchase Energy Corporation, Case No. 2004-00036***

Dear Ms. O'Donnell:

Enclosed for filing in the above-styled case is an original and ten copies of Ballard Rural Telephone Cooperative Corporation, Inc.'s Response to Motion for Extension of Time.

Thank you, and if you have any questions, please call me.

Very truly yours,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk

Enclosures

cc: All Parties of Record  
John E. Selent, Esq.



Pursuant to the order, the parties are required, simply, to revise their cable television attachment tariffs to reflect that the tariffs apply not only to cable television companies, but to other users as well. Moreover, given Jackson Purchase recently increased its cable television attachment tariff rates pursuant to the Commission's September 14, 2005 order in Case No. 2004-000319, *In the matter of: Application of Jackson Purchase Energy Corporation for Adjustment in Existing Cable Television Attachment Tariff*, there is no need for Jackson Purchase to recalculate its cable television attachment tariff rates. The Commission just approved a rate increase less than two years ago. Thus, it should be a simple matter for Jackson Purchase to revise its tariff; it simply needs to indicate that the tariff applies to operators of cable television, electric or telecommunications services.

Nonetheless, Jackson Purchase has moved for a sixty-day extension to file its revised tariff because "it needs additional time to compile the data necessary for completing the tariff." Ballard Rural is perplexed with regard to what information Jackson Purchase needs to compile. It is not necessary for Jackson Purchase to compile any data to file a tariff consistent with the Commission's order.

In summary, the Commission granted Ballard Rural and Jackson Purchase thirty days to file tariffs consistent with the Commission's August 2, 2007 order. Ballard Rural is prepared to file its revised cable television attachment tariff within the deadline established by the Commission, and is doing so today. Jackson Purchase has not explained why it needs an additional sixty days to comply with the Commission's order. Accordingly, the Commission should deny Jackson Purchase's motion for extension of time and order Jackson Purchase to

comply with the Commission's August 2, 2007 order.

Respectfully submitted,



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**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 First Class United States Mail, postage prepaid, to the following individuals this 4<sup>th</sup> day of September, 2007:

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