
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

November 1, 2004

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

RE: Case No. 2004-00250

Dear Ms. O'Donnell:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of AT&T Communications of the South Central States, Inc. Entry of Appearance and Motion for Extension of Time. 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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PUBLIC SERVICE
COMMISSION

In the Matter of:

AMERICAN FEDERATION OF STATE,)	
COUNTY, MUNICIPAL EMPLOYEES)	
COUNCIL 62 (AFSME COUNCIL 62))	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2004-00250
)	
AT&T COMMUNICATIONS OF THE)	
SOUTH CENTRAL STATES, LLC)	
)	
DEFENDANT)	

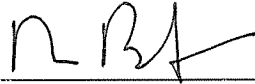
ENTRY OF APPEARANCE AND MOTION FOR EXTENSION OF TIME

AT&T Communications of the South Central States, LLC ("AT&T"), by its undersigned counsel, hereby requests a ten day extension of time to respond to Commission staff's first set of data requests to AT&T. As grounds for this request AT&T states that due to recent organizational changes affecting AT&T's Law and Government Affairs organization, in house counsel assigned to this matter has left AT&T and this matter has been reassigned.

AT&T is working to generate the invoices and other information requested by the Commission staff. However, AT&T has been unable to complete its response for filing on the original due date. A brief extension is needed to complete the production of documents and to allow review by counsel. As this complaint involves a billing dispute and not a current service dispute, AT&T believes that brief extension will not prejudice the complainant in this matter.

Wherefore, AT&T requests that the Commission grant this motion and permit AT&T to file its responses on or before November 11, 2004.

Respectfully submitted,

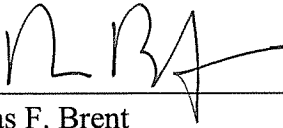


C. Kent Hatfield
Douglas F. Brent
Stoll, Keenon & Park, LLP
2650 AEGON Center
400 West Market Street
Louisville, Kentucky 40202
(502) 568-9100

Counsel for AT&T Communications of the South Central States, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Entry of Appearance and Motion for Extension of Time filed on behalf of AT&T Communications of the Southern States, LLC, was served upon all parties of record this 1st day of November, 2004.



Douglas F. Brent

Roger E. Poer
Controller
AFSCME Council 62
2210 Goldsmith Lane, #204
Louisville, Kentucky 40218

John F. Stewart
325 W. Main Street
Louisville, Kentucky 40202-4251

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FROM

STOLL, KEENON & PARK, LLP

ATTORNEYS AT LAW
2650 AEGON CENTER • 400 WEST MARKET STREET
LOUISVILLE, KENTUCKY 40202-3377

TO

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

