

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

JAN 18 2006

TOUCHSTONE, D/B/A ALEC, INC
Complainant
v.
ALLTEL COMMUNICATIONS, INC.
Respondent

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Case No. 2005-00482

PUBLIC SERVICE
COMMISSION

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO FORMAL COMPLAINT**

Kentucky ALLTEL, Inc. ("ALLTEL") moves for an extension of time to respond to the Formal Complaint filed by Touchstone, d/b/a/ ALEC, Inc. ("ALEC" or "Complainant") with the Kentucky Public Service Commission ("Commission") in Case No 2005-00482. In support of this Motion, ALLTEL states the following:


On January 12, 2006 the Commission issued an order requiring ALLTEL to satisfy or respond to ALEC's formal complaint within 10 days of the date of said order. The time frame in which ALLTEL is required to respond includes two weekends and a holiday, effectively reducing the response window to five business days. ALLTEL has been actively engaged in the formulation of its responses to the allegations raised by Complainant in their Formal Complaint. As the allegations in the Formal Complaint are numerous and complex, the formulation of ALLTEL's responses requires the compilation and review of a large amount of information. To date, ALLTEL has been able to compile a substantial amount of information to prepare its responses to several of the issues raised in the Formal Complaint. However, in order to compile the remainder of the data and information needed to adequately respond to the Formal Complaint in its entirety, ALLTEL respectfully requests that it be granted an additional fourteen (14) days within which to file its response to the Formal

Complaint. Extensions of time to respond are contemplated by 807 KAR 5:001, Section 12(6), if good cause is shown. ALLTEL respectfully submits that its request for an additional fourteen (14) days (a) will not unduly prejudice the Complainant and (b) will facilitate and expedite the resolution of the dispute by minimizing the need for subsequent amendments to the response.

WHEREFORE, ALLTEL, having shown good cause, respectfully requests an enlargement of time to file and serve its response to the Formal Complaint until Monday, February 6, 2006.

Respectfully submitted,

KENTUCKY ALLTEL, INC.

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Extension of Time to Respond to Formal Complaint was served upon the following via regular U.S. mail postage prepaid this 18th day of January, 2006:

Jonathon N. Amlung
Attorney for:
TOUCHSTONE, d/b/a/ALEC, Inc.
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Attorney for Kentucky ALLTEL, Inc.

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