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#### COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION

DEC 2 1 2005

BellSouth Telecommunications, Inc.'s Notice of Intent to Disconnect SouthEast Telephone, Inc. for Non-Payment	)	Case No. 2005-00519 <sup>COMMISSION</sup>
SouthEast Telephone, Inc.	)	
Complainant,	)	<b>६३</b> ३
v.	)	Case No. 2005-00 <del>519</del>
BellSouth Telecommunications, Inc.	)	
Defendant.	)	

# SOUTHEAST TELEPHONE OPPOSITION TO BELLSOUTH MOTION

SouthEast Telephone, Inc. ("SouthEast") opposes BellSouth's Motion to Shorten the Time for Briefing. Apart from interposing an argument regarding the merits of the case, BellSouth has provided absolutely no justification for changing the schedule duly established by the Commission.

SouthEast will not dignify BellSouth's motion by responding in kind to BellSouth's ad hominem attack on SouthEast's counsel, BellSouth's outrageous mischaracterization of his conversation with Ms. Chambers, or BellSouth's baseless slur on SouthEast's motives. Suffice it to say that the Commission should not reward BellSouth's "dirty pool" tactics by modifying the procedural schedule in this case.

Respectfully submitted,

David L. Sieradzki HOGAN & HARTSON, LLP 555 – 13th St., N.W. Washington, D.C. 20004 (202) 637-6462

Dated: December 21, 2005

Jonathon M. Amlung

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### **CERTIFICATION**

I hereby certify that a true and correct copy of the foregoing was mailed, this the

21st day of December, 2005 to:

Ms. Dorothy Chambers
BellSouth Telecommunications, Inc.
601 W. Chestnut Street
Louisville, KY 40203

JONATHON N. AMLUNG