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PUBLIC SERVICE

COMMISSION

Via Hand Delivery

May 30, 2006

Ms. Beth A. O'Donnell **Executive Director** Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602-0615

Case, No. 2006-00715

Re: Request for Commission Mediation Pursuant to 47 U.S.C. Section 252(a)(2)

Dear Ms. O'Donnell:

As you are aware, the interim intercarrier compensation arrangements provided for in the settlement agreement between certain signatory CMRS providers, including Verizon Wireless, Cingular, T-Mobile, American Cellular Corporation, and Sprint (hereinafter "CMRS Providers"), BellSouth Telecommunications, Inc. ("BellSouth"), and certain Rural ILECs1 that was approved by the Commission in Case No. 2003-00045 ("Settlement Agreement") by Orders dated April 29, 2004 and June 10, 2004 and which has been effective since May 1, 2004 is due to expire on December 31, 2006. In accordance with the Settlement Agreement, each CMRS Provider initiated negotiation of an interconnection and reciprocal compensation agreement with particular Rural ILECs pursuant to the process set forth in Sections 251 and 252 of the Communications Act of 1996, as amended (the "Act").

Despite the independent and on-going negotiations between all parties that are currently exchanging traffic under the Settlement Agreement, no voluntary interconnection agreements providing for indirect interconnection under the Act have been reached at this time. In order to assist the CMRS Providers and Rural ILECs currently engaged in negotiations on reaching agreement on the rates, terms and conditions for reciprocal compensation and interconnection, the CMRS Providers hereby request the participation of the Commission in these negotiations and that the Commission mediate any differences arising in the course of negotiation pursuant to 47 U.S.C. Section 252(a)(2).

¹ The Rural ILECs with whom the CMRS Providers have requested interconnection negotiations are AllTel Kentucky, Ballard Rural Telephone Cooperative Corporation, Inc., Brandenburg Telephone Company, Duo County Telephone Cooperative Inc., Foothills Rural Telephone Cooperative Corporation, Inc., Coalfields Telephone Company, Leslie County Telephone Company, Inc., Lewisport Telephone Company, Inc., Logan Telephone Cooperative, Inc., Highland Telephone Cooperative, North Central Telephone Cooperative, Mountain Rural Telephone Cooperative Corporation, Inc., Peoples Rural Telephone Cooperative Corporation, Salem Telephone Company, South Central Rural Telephone Cooperative Corporation, Inc., Thacker/Grigsby Telephone Company, Inc., and West Kentucky Rural Telephone Cooperative Corporation, Inc.

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Collective Commission mediation/negotiation is highly practical and desirable in this instance where the fundamental issues of indirect interconnection, reciprocal and symmetrical compensation, and the rates at which a given Rural ILEC is required to terminate CMRS Providers' traffic are so similar. The CMRS Providers believe that such a process would be particularly useful in this situation given the sheer number of individual negotiations currently underway.

Accordingly, the CMRS Providers respectfully request that the Commission host mediation sessions between the CMRS Providers and the Rural ILECs during the next month, if possible. So that the mediation process can be fully utilized before any party feels compelled to file formal arbitration petitions with the Commission, the CMRS Providers are requesting the Rural ILECs to extend by 90 days the current arbitration window which is otherwise set to expire on June 10, 2006.² Given the December 31, 2006 expiration date of the Settlement Agreement, no party should be prejudiced by such an extension.

Thank you for your consideration and assistance, and please call me if you should have any questions regarding this matter.

Sincerely,

On behalf of the CMRS Providers

cc: Amy E. Dougherty

Jim Stevens

John Selent - Ballard, Duo County, Logan and West Kentucky Rural Telephone Eileen Bodamer – Foothills, Coalfields, Mountain, Peoples, South Central Rural,

North Central and Thacker – Grisby Telephone

Linda Lowrance – Leslie County, Lewisport and Salem Telephone

Allison Willoughby – Brandenburg Telephone

Jimmy Dolan – AllTel Kentucky

Dave Crawford - Highland Telephone

Elaine Critides – Verizon Wireless

Leon Bloomfield - American Cellular Corporation and T-Mobile USA

Dan Williams – T-Mobile USA

John N. Hughes – Sprint Nextel

Mark Ashby - Cingular Wireless

William R. Atkinson – Sprint Nextel

Paul Walters - Cingular Wireless

Bill Brown - Cingular Wireless

² Certain parties have already agreed to extend the window and the appropriate motions will be filed shortly with the Commission. In addition, the CMRS Providers note that it appears certain Rural ILECs mailed Petitions for Arbitration to the Commission on Friday, May 26, 2006.