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June 2, 2006

Beth A. O'Donnell, Executive Director Public Service Commission of the Commonwealth of Kentucky 211 Sower Boulevard Frankfort, Kentucky 40602-0615

May 30, 2006 Request for Commission Mediation Pursuant to Re: 47 U.S.C. Section 252(a)(2) filed on behalf of the CMRS Providers'1 in Case No. 2003-00045 FKF File No. 171-30 Case No. 2006-00715

Dear Ms. O'Donnell:

I have been retained by the companies noted below² (collectively,"E-ILECs") in the above referenced matter. The E-ILECs, like the CMRS Providers, are parties to the Settlement Agreement that was approved by the Commission in Case No. 2003-00045. That Agreement, which expires December 31, 2006, requires the CMRS Providers to seek interconnection arrangements directly with the Rural ILECs³. For the most part, the CMRS Providers did so and the E-ILECs and CMRS Providers have been engaged in varying levels of discussion in this matter.

In their May 30, 2006 filing, the CMRS Providers request that the Commission host within the next month, collective mediation between the CMRS Providers and Rural ILECs pursuant to 47 U.S.C. Section 252(a)(2). They further request that the date for the current arbitration window be extended by 90 days from June 10, 2006 (mathematically, September 8, 2006).

The E-ILECs do not disagree that the sheer number of negotiations imposed on both

²Foothills Rural Telephone Cooperative Corporation, Inc., Coalfields Telephone Company, Mountain Rural Telephone Cooperative, Inc., Peoples Rural Telephone Cooperative Corporation, and Thacker-Grigsby Telephone Company.

³All incumbent telephone service providers in the state, excluding BellSouth

¹Verizon Wireless, American Cellular Corporation, T-Mobile USA, Sprint Nextel, and **Cingular Wireless**

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the Rural ILECs and CMRS Providers has made the timely completion of voluntarily negotiated agreements problematic. Accordingly, the E-ILECs have already agreed to and concur with the CMRS Providers' request for the 90-day extension of the negotiation window.

The E-ILECs disagree, however with the collective mediation process proposed by the CMRS Providers. This collective mediation was requested by at least one of the CMRS providers during initial discussions and was declined at that time. The reason for doing so remains the same; despite suggesting that all the Rural ILECs have the same issues, they do not. Imposing a group mediation effort on the Rural ILECs will simply not be a productive use of the companies' resources.

While the E-ILECs do not oppose consolidating efforts where they naturally occur, imposing a state-wide process on the Rural ILECs that forces each side to engage in discussions that may not concern that company will be a waste of time, money, and effort.

Very truly yours,

FRANCIS, KENDRICK & FRANCIS

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