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August 30, 2006

Via Hand Delivery

Hon. Beth O'Donnell Executive Director Public Service Commission 211 Sower Blvd. P. O. Box 615 Frankfort, KY 40601 RECEIVED

AUG 3 1 2006

PUBLIC SERVICE COMMISSION

Re: In the Matter of: Petition of Logan Telephone Cooperative, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with American Cellular f/k/a ACC Kentucky License LLC, Partnership Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996, Case No. 2006-00218

Dear Ms. O'Donnell:

Logan Telephone Cooperative, Inc. hereby joins in the Motion to Schedule Informal Conference filed by Ballard Rural Telephone Cooperative Corporation, Inc. in Case No. 2006-00215, a copy of which is attached hereto.

Thank you, and if you have any questions, please call me.

Very truly yours,

**DINSMORE & SHOHL LLP** 

John E. Selent

JES/bmt Enclosure

cc: All Parties of Record (w/enclosure)

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# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION RECEIVED

In the Matter of:		AUG 3 1 2006
Petition of Ballard Rural Telephone Cooperative	)	PUBLIC SERVICE
Corporation, Inc. for Arbitration of Certain Terms	)	COMMISSION
and Conditions of Proposed Interconnection	)	
Agreement with American Cellular Corporation	)	
f/k/a ACC Kentucky License LLC,	)	Case No. 2006-00215
Pursuant to the Communications Act of 1934,	)	
as Amended by the Telecommunications	)	
Act of 1996	j	

#### MOTION TO SCHEDULE INFORMAL CONFERENCE

Petitioner, Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), by counsel, pursuant to 807 KAR 5:001, Section 4(4) hereby respectfully moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission") to schedule an informal conference in the above matter for the purposes of discussing, among other things: 1) the impact on the procedural schedule of the Commission's recent orders requiring Petitioner to conduct a TELRIC cost study; and 2) the advisability of bifurcating this proceeding in order to address (a) the non-cost/price issues in one part of this proceeding pursuant to the present procedural schedule and (b) the cost/price issues pursuant to a new procedural schedule in order to give the rural ILEC's time to conduct the TELRIC cost studies ordered by the Commission.

As grounds for this motion, Petitioner quotes the order of the Commission in this matter dated August 18, 2006: ". The July 25, 2006 Order remains in full force and effect with the sole exception of permitting the RLECs additional time, if needed to file their TELRIC-based cost studies and written testimony." Id. Additionally, as the testimony of Steven E. Watkins, prefiled in this matter on August 16, 2006, demonstrates, the cost involved in completing TELRIC could be in the

neighborhood of \$50,000 - \$100,000 and, more to the point, the time required to complete such studies could be several months, or more. <u>Id</u>. Watkins testimony at p. 11-12.

Petitioner believes such an informal conference will promote a just and efficient resolution of this matter. Finally, Petitioner asks that the parties be allowed to participate at this informal conference, at their option, either by telephone or in person.

Therefore, Petitioner asks that the Commission schedule an informal conference in this matter to be held at the earliest convenient date.

Respectfully submitted,

John E. Selent Holly C. Wallace

Edward T Depp

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COUNSEL TO BALLARD RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by first-class United States mail and electronic mail on this \_30\omega day of August, 2006, to the following individual(s):

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