## Dinsmore Shohl LLP

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AUG 0 4 2006

PUBLIC SERVICE COMMISSION

August 4, 2006

#### VIA HAND DELIVERY

Ms. Beth O'Donnell Executive Director Public Service Commission 211 Sower Blvd. Frankfort, KY 40601

Re: Petition of West Kentucky Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with American Cellular Corporation f/k/a ACC Kentucky License LLC; Case No. 2006-00220

Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original and eleven (11) copies of the Petition for Suspension and/or Modification of West Kentucky Telephone Cooperative Corporation, Inc. in the above-referenced matter. Please file stamp one (1) copy of the motion and return it our deliveryperson.

Thank you, and if you have any questions, please contact me at (502) 540-2300.

Sincerely,

Edward I. Depp

ETD/lb Enclosures

cc: Trevor Bonnstettor (w/encl.)

Ms. Beth O'Donnell August 4, 2006 Page 2 of 2

Steven E. Watkins (w/o encl.)
John E. Selent, Esq. (w/o encl.)
Holly C. Wallace, Esq. (w/o encl.)

112385v1

### COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION



In the Matter of:

AUG 0 4 2006

Petition of West Kentucky Rural Telephone	)	PUBLIC SERVICE
Cooperative Corporation, Inc. for	)	COMMISSION
Arbitration of Certain Terms and	)	
Conditions of Proposed Interconnection	)	
Agreement with American Cellular Corporation	)	
f/k/a ACC Kentucky License LLC,	)	Case No. 2006-0220
Pursuant to the Communications Act of 1934,	)	
as Amended by the Telecommunications	)	
Act of 1996	)	

#### PETITION FOR SUSPENSION AND/OR MODIFICATION

West Kentucky Rural Telephone Cooperative Corporation, Inc. ("West Kentucky"), by counsel, pursuant to the Telecommunications Act of 1996, KRS Chapter 278, and 807 KAR 5:001, hereby requests that the Public Service Commission of the Commonwealth of Kentucky ("Commission") grant West Kentucky's petition for suspension and/or modification of any requirement that West Kentucky conduct TELRIC studies. For its petition for suspension and/or modification, West Kentucky hereby incorporates by reference as if fully set forth herein the petition for suspension and/or modification, as well as the factual and legal grounds therefor, filed by Ballard Rural Telephone Cooperative Corporation, Inc., in Case No. 2006-00215.

Respectfully submitted,

John E. Selent

Edward T. Depp

Holly C. Wallace

**DINSMORE & SHOHL LLP** 

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# COUNSEL TO WEST KENTUCKY RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by Federal Express and electronic mail on this day of August, 2006, to the following individual(s):

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COUNSEL TO WEST KENTUCKY RURAL TELEPHONE COOPERATIVE CORPORATION, INC.