

AUG 0 4 2006

PUBLIC SERVICE

insmore&Shohlup

Edward T. Depp 502-540-2347 tip.depp@dinslaw.com

August 4, 2006

VIA HAND DELIVERY

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

> Petition of Foothills Rural Telephone Cooperative Corporation, Inc. for Re: Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless Pursuant to the Communications Act of 1934 as Amended by the Telecommunications Act of 1996, Case No. 2006-00292

Dear Ms. O'Donnell:

Enclosed for filing in the above-styled case please find the original and eleven (11) copies of the Petition for Suspension and/or Modification of Foothills Rural Telephone Cooperative Corporation, Inc. Please file stamp one (1) copy of the motion and return it to our delivery person.

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

Sincerely.

Edward T. Depp

112371v1

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION



_	. •			_
1 12	tho	. 1\ /1	atter	~ t ·
	1116	101	21163	())

AUG 0 4 2006

Petition of Foothills Rural Telephone Cooperative)	PUBLIC SERVICE
Corporation, Inc., for Arbitration of Certain Terms)	COMMISSION
And Conditions of Proposed Interconnection)	
Agreement with Cellco Partnership d/b/a Verizon)	
Wireless, GTE Wireless of the Midwest)	
Incorporated d/b/a Verizon Wireless, and Kentucky	·)	Case No. 2006-00292
RSA No. 1 Partnership d/b/a Verizon Wireless,)	
Pursuant to the Communications Act of 1934,)	
as Amended by the Telecommunications)	
Act of 1996)	
	•	

PETITION FOR SUSPENSION AND/OR MODIFICATION

Foothills Rural Telephone Cooperative Corporation, Inc. ("Foothills Rural"), 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 Foothills Rural's petition for suspension and/or modification of any requirement that Foothills Rural conduct TELRIC studies. For its petition for suspension and/or modification, Foothills Rural 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 Holly C. Wallace

Edward T. Depp

DINSMORE & SHOHL LLP

1400 PNC Plaza

500 W. Jefferson Street

Louisville, Kentucky 40202

(502) 540-2300 (telephone)

(502) 585-2207 (fax)

COUNSEL TO FOOTHILLS 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 47 day of August, 2006, to the following individual(s):

Kendrick R. Riggs, Esq.
Douglas F. Brent, Esq.
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
kendrick.riggs@skofirm.com
douglas.brent@skofirm.com

Counsel to T-Mobile and Counsel to Verizon

COUNSEL TO FOOTHILLS RURAL TELEPHONE COOPERATIVE

CORPORATION, INC.