# Dinsmore & Shohl LLP

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PUBLIC SERVICE COMMISSION

February 23, 2007

### **VIA FEDERAL EXPRESS**

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

Re: In the matter of: Petition of Mountain Rural Telephone Cooperative Corporation, Inc., for 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. 2006-00296

Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original and eleven (11) copies of Mountain Rural Telephone Cooperative Corporation, Inc.'s Motion for Extension of Time. Please file-stamp one copy and return it to me in the enclosed self-addressed stamped envelope.

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

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Sincerely.

Edward T. Depp

ETD/lb Enclosures

cc: Philip R. Schenkenberg, Esq.

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## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

Petition of Mountain Rural Telephone Cooperative )
Corporation, Inc., for 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, 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

In the Matter of:

Case No.2006-00296

#### MOTION FOR EXTENSION OF TIME

Petitioner Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain") hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission") to extend by one week the parties' respective deadlines to file evidence supporting the appropriate interMTA traffic factors to be incorporated into their respective interconnection agreements. In support of its motion, Mountain states that it has been actively involved with T-Mobile and Verizon Wireless in negotiating a resolution to this issue, and an additional week will provide the parties with sufficient time to explore whether this issue can be resolved without Commission intervention. T-Mobile and Verizon Wireless have indicated to counsel that they do not oppose this motion.

Accordingly, Mountain moves the Commission to permit the parties to file their evidence supporting an appropriate interMTA traffic factor by the following dates.

**Mountain:** File by Monday, March 5, 2007.

**Verizon Wireless:** File by Wednesday, April 4, 2007.

**T-Mobile:** File by Wednesday, April 4, 2007.

Respectfully submitted,

John E. Selent Holly C. Wallace Edward T. Depp

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COUNSEL TO MOUNTAIN 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 23rd day of February, 2007, to the following individual(s):

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Counsel to T-Mobile and Verizon Wireless

COUNSEL TO MOUNTAIN RURAL TELEPHONE COOPERATIVE CORPORATION, INC.