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PUBLIC SERVICE COMMISSION

Holly C. Wallace 502-540-2309 holly.wallace@dinslaw.com

August 3, 2006

### VIA HAND DELIVERY

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

> Re: 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. 2006-00294 00396 MI

Dear Ms. O'Donnell:

Enclosed for filing in the above-styled case please find the original and eleven (11) copies of the Motion for Rehearing of Mountain 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,

Holly C. Wallace

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# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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 ) RECEIVED

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PUBLIC SERVICE COMMISSION

Case No. 2006-00296

### **MOTION FOR REHEARING**

Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain Rural"), by counsel, pursuant to the Telecommunications Act of 1996, KRS 278.400, and 807 KAR 5:001, hereby moves the Public Service Commission of the Commonwealth of Kentucky for rehearing of its July 25, 2006 Order in the above-captioned matter. For its motion, Mountain Rural hereby incorporates by reference as if fully set forth herein the motion for rehearing, 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. Selen

John E. Selenty 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 MOUNTAIN 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 26 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 FO MOUNTAIN RURAL TELEPHONE COOPERATIVE CORPORATION, INC.