# Dinsmore Shohl LLP

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

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. 2006-00296

#### 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 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.

Edward T. Depp

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION



In the Matter of:

AUG 0 4 2008

		DIDLICATION
Petition of Mountain Rural Telephone Cooperative	)	PUBLIC SERVICE COMMISSION
Corporation, Inc., for Arbitration of Certain Terms	)	to the state of
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. 2006-00296
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

Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain 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 Mountain Rural's petition for suspension and/or modification of any requirement that Mountain Rural conduct TELRIC studies. For its petition for suspension and/or modification, Mountain 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 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 4 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 MOUNTAIN TELEPHONE COOPERATIVE>

CORPORATION, INC.