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Dinsmore & Shohl LLP

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COMMISSION

Holly C. Wallace 502-540-2309 hwallace@dinslaw.com

November 2, 2007

### VIA HAND DELIVERY

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

Re:

In the Matter of: The Application of North Central Telephone Cooperative Corporation for a Certificate of Public Convenience and Necessity for the Construction of Fiber Optic Cable in Allen County, Kentucky, Case No. 2007-00432

Dear Ms. O'Donnell:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of North Central Telephone Cooperative Corporation's motion for extension of time.

Thank you, and if you have any questions with regard to this matter, please call me.

Very truly yours,

DINSMORE & SHOHL LLP

Holly C. Wallace

HCW Enclosure

cc:

F. Thomas Rowland Johnny McClanahan

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## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

### In the Matter of:

The Application of North Central	)	Case No. 2007-00432
<b>Telephone Cooperative Corporation for a</b>	)	Case No. 2007-00432 RECEIVED
Certificate of Public Convenience and	)	•
<b>Necessity for the Construction of Fiber</b>	)	NOV 02 2007
Optic Cable in Allen County, Kentucky	)	PUBLIC SERVICE

### **MOTION FOR EXTENSION OF TIME**

North Central Telephone Cooperative Corporation ("North Central"), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission") for a two-week extension of time to file responses to Commission Staff's First Data Requests. In support of its motion, North Central states as follows.

Commission Staff issued its First Data Requests in the above-referenced matter on October 23, 2007, and established a November 2, 2007 deadline for North Central to respond. North Central has worked diligently to provide the Commission with the requested information within the time allotted. However, in order to provide the Commission with "a detailed explanation regarding the status of the fiber optic cable construction project within Kentucky and Tennessee," for example, North Central must consult with its outside engineering firm. Key personnel from the engineering firm have been attending the Kentucky Telephone Association and Tennessee Telecommunications Association Joint Fall Meeting in Bowling Green, Kentucky, and therefore have been unavailable.

In addition, Data Request No. 3 seeks information that, as understood by North Central, requires it to essentially re-create its RUS broadband loan application using historical and forecasted data from 2003 through 2012. The RUS broadband loan application is a voluminous document and, despite its best efforts, North Central has not been able to prepare the document within the time allotted. The five-year forecast requires North Central to obtain information from its outside

engineering firm. As mentioned above, key personnel from that firm have been unavailable. Moreover, preparation of the forecast requires North Central to identify a multitude of variables and evaluate and estimate each variable's impact on each asset, liability, revenue source and expense for the forecasted five-year period. It took North Central several months to prepare such a projection when it originally filed its RUS broadband loan application in 2003. Thus, even with a two-week extension, it will be difficult for North Central to prepare the requested financial data. Nonetheless, North Central will use its best efforts to provide the Commission with the data it seeks.

Accordingly, North Central respectfully requests that the Commission grant its motion for a two-week extension to respond to the Commission Staff's First Set of Data Requests.

Respectfully submitted,

John E. Selent

Holly C. Wallace

Edward T. Depp

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