## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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Defendants

## MOTION OF DEFENDANTS FOR EXTENSION OF TIME TO FILE ANSWER

Come Windstream Kentucky West, Inc. and Windstream Kentucky East, Inc. (collectively, "Windstream"), by counsel and hereby move the Public Service Commission for an extension of time through and including Thursday, January 17, 2008 within which to file an answer to the Complainants' Petition in the above-styled action. Windstream's Answer to the Complainants' Petition is due to be filed on or before December 27, 2007. Due to holiday schedules of key Windstream personnel working on the above-styled matter and the scope of the Issues set forth in the Petition, Windstream respectfully requests through and until Thursday, January 17, 2008 within which to file its Answer.

Considering that the crux of the Petition concerns current lawfully tariffed rates for which Complaintants have no pending billing disputes, granting the requested extension of time of 21 days will not result in prejudice to any of the parties. Furthermore, Windream has discussed its request for extension with Complainants' counsel, and Complainants' counsel advised Windstream on December 18, 2007 that Complainants do not object to the extension.

For the above stated reasons, Windstream hereby requests the Public Service Commission to grant it through and until January 17, 2008 within which to file its Answer to the Complainants' Petition.

Respectfully submitted,

Robert C. Moore HAZELRIGG & COX, LLP 415 West Main Street, 1<sup>st</sup> Floor P. O. Box 676 Frankfort, Kentucky 40602-0676 (502) 227-2271

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon Douglas F. Brent and C. Kent Hatfield, Stoll, Keenon Ogden, PLLC, 2000 PNC Plaza, 500 West Jefferson Street, Louisville, Kentucky 40202 and Dulaney L. O'Roark III Vice President and General Counsel - Southern Region, Verizon, 5055 North Point Parkway, Alpharetta, Georgia 30022, by placing same in the U.S., Mail, postage pre-paid, this the 18<sup>th</sup> day of December, 2007.

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