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March 22, 2011

RECEIVED

MAR 22 2011

PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

RE: Petition of Nexus Communications, Inc. for Additional Designation as an Eligible
Telecommunications Carrier in Kentucky
Case No. 2009-00110

Dear Mr. DeRouen:

Enclosed for filing in this case please find an original and ten copies of Nexus Communications, Inc.'s Motion for Expedited, Interim Order Granting Expanded Wireline Eligible Telecommunications Status in the above referenced matter. Please place your file stamp on the extra copy and return to me via our runner.

If you have any questions concerning this filing, please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely yours,

Deborah T. Eversole

DTE:ec
Enclosures

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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MAR 22 2011

PUBLIC SERVICE
COMMISSION

In the Matter of:

PETITION OF NEXUS)
COMMUNICATIONS, INC. FOR)
ADDITIONAL DESIGNATION AS)
AN ELIGIBLE)
TELECOMMUNICATIONS)
CARRIER IN KENTUCKY)

CASE NO. 2009-00110

**MOTION OF NEXUS COMMUNICATIONS, INC.
FOR EXPEDITED, INTERIM ORDER GRANTING EXPANDED
WIRELINE ELIGIBLE TELECOMMUNICATIONS STATUS**

Nexus Communications, Inc. d/b/a TSI (“Nexus”), by counsel, hereby moves the Commission to expedite its consideration of Nexus’s request for expanded wireline eligible telecommunications carrier (“ETC”) status throughout the BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky (“AT&T”) service area for the purpose of receiving low income, rather than high cost, federal universal service support and to enter its interim order in this docket approving that request. Nexus has applied for both wireless and expanded wireline ETC status in the Commonwealth, and urges the Commission to grant both as soon as possible.

Nexus nevertheless recognizes that wireless ETC applications present additional issues that do not arise with regard to wireline, including issues that until quite recently were matters of first impression.¹ In contrast, the Commission has granted low income ETC status to several wireline carriers this year alone, and there are no pending matters of first impression with respect to the identical relief Nexus is seeking. Moreover, Nexus is already an ETC within parts of Kentucky.

¹ See generally, *Tracfone Wireless*, Case No. 2009-00100 (Order dated September 23, 2010).

Currently, Nexus is at a significant competitive disadvantage compared to other competitive ETCs providing wireline Lifeline service in AT&T's Kentucky service area. Nexus is seeking parity with those numerous competitive ETCs whose approvals have already been granted. Nexus therefore requests that its wireline and wireless ETC requests be separately considered so that an Order granting wireline ETC status in AT&T's Kentucky service area may be entered as soon as possible.

As further grounds for its Motion, Nexus states that its qualifications for wireline ETC status in the AT&T area are indistinguishable from those of other competing local exchange carriers ("CLECs") whose applications for low income universal service support for wireline operations have been granted by the Commission. As Nexus has previously documented in this docket, its application meets the standards specified by both federal and state law. In addition, its 47 U.S.C. §252 agreement with AT&T includes the same arrangements as exist between AT&T and other CLECs in Kentucky who have been granted ETC status by the Commission. That agreement provides for the provision of network elements to Nexus and is on file with the Commission.

For the foregoing reasons, Nexus respectfully requests that:

1. The Commission expedite its consideration of Nexus's request for expanded eligible telecommunications carrier status for Nexus's wireline operations in AT&T's exchange territory in Kentucky; and
2. The Commission enter, at the earliest possible date, its interim order approving that portion of Nexus's application that requests expanded ETC status for its wireline operations within the AT&T exchange territory for low income support only.

Respectfully submitted,

A handwritten signature in cursive script that reads "Deborah T. Eversole". The signature is written in black ink and is positioned above the printed name.

Deborah T. Eversole

Douglas F. Brent

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Counsel for Nexus Communications, Inc.

Dated: March 22, 2011