

HURT, CROSBIE & MAY PLLC

William C. Hurt, Jr.
Scott A. Crosbie
William H. May, III
Michael D. Kalinyak
Steven Lenarz
Matthew R. Malone
Aaron D. Reedy
James L. Deckard
Jacob K. Michul

THE EQUUS BUILDING
127 WEST MAIN STREET
LEXINGTON, KENTUCKY 40507

Telephone - (859) 254-0000
Facsimile - (859) 254-4763
mmalone@hcm-law.com

Jennifer S. Scutchfield *

* Of Counsel

September 16, 2011

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SEP 16 2011

PUBLIC SERVICE
COMMISSION

Via Hand-Delivery

Mr. Jeff DeRouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

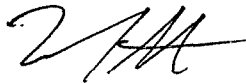
RE: *Case No. 2009-00110*

Dear Mr. DeRouen:

Please find enclosed for filing an original and ten (10) copies of Nexus Communications, Inc.'s Motion to Hold All Pending Matters in Abeyance.

Please place the documents of file. Should you have any questions regarding the enclosed, please contact me at your convenience.

Regards,



Matthew Malone

C: File; Hon. B. May; Hon. D. Frappier; Hon. C. Fedeli

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

In the Matter of: : CASE NO. 2009-00110

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

MOTION OF NEXUS COMMUNICATIONS, INC. TO HOLD
ALL PENDING MATTERS IN ABEYANCE

Comes Nexus Communications, Inc. (“Nexus”), by counsel, and for its motion to hold all pending matters in abeyance, states as follows:

Nexus currently has a Petition for ETC status pending before the Commission. Likewise, Nexus has pending a Petition for Confidentiality concerning certain items in its Response to the Commissions’ Third Data Request which was filed on June 16, 2011.

Nexus’ currently has similar proceedings (e.g. Petitions for ETC status and confidentiality) pending in other state commissions. There is variance among the states regarding confidentiality standards. Given the high threshold to meet the confidentiality requirements of KRS 61.878(1) Nexus is concerned that the disclosure of certain highly confidential and proprietary information may result from the Kentucky proceedings. Nexus seeks to protect this information across all states including Kentucky. Moving forward with the current proceeding in Kentucky has the potential to jeopardize Nexus’ position in those other jurisdictions. Nexus believes that resolution of pending matters in other jurisdictions will occur within the next fourteen (14) months.

As such, Nexus respectfully requests that the Commission hold all matters pending before the Commission including the Petition for ETC status and Petition for Confidentiality in abeyance until such time as the disclosures sought by the Commission Staff would no longer

conflict with confidentiality protections sought by Nexus in other states or the issues otherwise become moot. At such time Nexus could contact Commission Staff and move forward with the current Petitions. Alternatively, if the Commission would like a set time period for review of this matter, Nexus' respectfully requests that the Commission set this matter to be reviewed in one (1) year from its Order or at some other time deemed appropriate by the Commission.

Wherefore, Nexus respectfully moves for the relief requested herein.

Respectfully submitted,

HURT, CROSBIE & MAY PLLC



William H. May, III
Matthew R. Malone
The Equus Building
127 West Main Street
Lexington, Kentucky 40507
(859) 254-0000 (office)
(859) 254-4763 (facsimile)

Hon. Danielle Frappier
Hon. Chris Fedeli
DAVIS WRIGHT TREMAINE, LLP
1919 Pennsylvania Ave. NW
Suite 800
Washington, D.C. 20006-3401
Phone: (202) 973-4242