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November 3, 2010

VIA OVERNIGHT MAIL

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

RECEIVED

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PUBLIC SERVICE
COMMISSION

Re: Petition of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky for Arbitration of Interconnection Agreement With Sprint Spectrum L.P., Nextel West Corp., and NPCR, Inc. d/b/a Nextel Partners
KPSC 2010-00061

Dear Mr. Derouen:

Enclosed for filing in the above-captioned case are the original and (10) ten copies of Joint Motion for Amended Procedural Schedule.

Should you have any questions, please let me know.

Sincerely,


Mary K. Keyer

Enclosures

cc: Parties of Record

866273

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

PETITION FOR ARBITRATION OF THE)
INTERCONNECTION AGREEMENT BETWEEN)
BELLSOUTH TELECOMMUNICATIONS, INC.) CASE NO. 2010-00061
D/B/A AT&T KENTUCKY AND SPRINT SPECTRUM)
L.P., NEXTEL WEST CORP., AND NPCR, INC..)
D/B/A NEXTEL PARTNERS)

JOINT MOTION FOR AMENDED PROCEDURAL SCHEDULE

BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky"), Sprint Spectrum, L.P., Nextel West Corp., and NPCR, Inc. d/b/a Nextel Partners (collectively, "Sprint CMRS"), and Sprint Communications Company L.P. ("Sprint CLEC"), submit this Joint Motion for Amended Procedural Schedule. Sprint CMRS and Sprint CLEC are collectively referred to herein as "Sprint."


On August 10, 2010, the Public Service Commission of Kentucky ("Commission") issued an Order granting the Parties' joint motion for a procedural schedule and ordered the Parties to follow the procedural schedule provided in the Appendix to that Order. The Parties have filed their simultaneous direct and rebuttal testimonies in accordance with that Order. The hearing is currently scheduled for December 14-16, 2010.

As the Commission is aware, AT&T Kentucky and Sprint are engaged in arbitration proceedings regarding many of the same issues in multiple other jurisdictions and are coordinating a regional procedural schedule. Due to illness of a witness and the Parties' desire to engage in further settlement discussions to attempt to resolve or narrow some or all of the issues in these cases, the Parties have agreed to changes in

the regional procedural schedule and hereby request the current procedural schedule in this docket be modified to provide for a hearing date of June 28-30, 2011. Additionally, the Parties propose that an updated Decision Point List ("DPL") be filed by February 25, 2011, and any Supplemental Testimony (if it is deemed necessary) be filed by June 1, 2011.¹ An Amended Joint Procedural Schedule reflecting these proposed changes is attached.

Based on the foregoing, AT&T Kentucky and Sprint request that the Commission issue an order adopting the Parties' Amended Joint Procedural Schedule.

Respectfully submitted this 3rd day of November, 2010.



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¹ In mid-January, 2011, the Parties will attempt to agree on appropriate parameters for supplemental testimony, subject to the Commission's approval. Thus, the Commission's approval of the proposed schedule will leave open for later determination the scope of supplemental testimony, if any.

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AMENDED JOINT PROCEDURAL SCHEDULE

The following schedule for the conduct of this arbitration shall apply:

February 25, 2011	Revised Joint Decision Point List filed
May 19, 2011	No new data requests propounded after this date
June 1, 2011	Supplemental Testimony (if deemed necessary) filed
June 28-30, 2011	Hearing. Attorneys for the Parties shall gather early on the first date of the hearing to discuss any outstanding procedural issues.

Simultaneous Post-Hearing Briefs: 45 days after Receipt of Hearing Transcript.

Simultaneous Post-Hearing Reply Briefs: 30 days after Post-Hearing Briefs.

The discovery window is open and is being conducted under the following parameters:

1. Written discovery shall be limited to a total of 100 distinct discovery requests of any type from each Party for all arbitrations pending or to be filed in the Arbitration States. Parts and subparts of a request shall be counted as separate requests. A given request shall be counted as a single request even though it may seek information regarding more than one Arbitration State or (insofar as the Parties may be required to propound or file discovery in more than one state covered by the stipulation) has been propounded in more than one state.
2. The Parties believe written discovery, pre-filed testimony and the record through and including the arbitration hearings will create a sufficient record for the respective Commissions to render arbitration decisions and, therefore, agree that neither Party will initiate deposition discovery. If a Commission Staff or statutory advocate seeks deposition discovery despite the Parties' agreement not to initiate deposition discovery, the Parties will jointly request that such deposition discovery be coordinated with deposition discovery sought in any other state so that such discovery is:
 - a. Limited to witnesses who have submitted testimony in the arbitration;
 - b. Limited to one deposition per witness for all proceedings; and,
 - c. Conducted at mutually acceptable locations, times and dates for witness depositions.

3. Responses to discovery propounded in one state (including discovery propounded by Commission Staff or statutory advocates) shall be treated as if produced in all states covered by this stipulation. Any time before the close of the arbitration hearing record in a given state, either Party may file and move for admission of discovery responses propounded in another state, and the non-filing Party shall not object to the admission of such discovery on the basis that the discovery was propounded and answered in another state. Notwithstanding the foregoing, the Parties reserve their right to object to admissibility based on any other grounds.
4. Objections to discovery shall be served within 10 calendar days of service of the request.
5. Responses to discovery shall be served within 21 calendar days of service of the request.
6. Requests and responses shall be served electronically, with hard copies to follow.
7. The Parties agree to use a mutually acceptable regional protective agreement for use in the proceedings.