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July 25, 2011

RECEIVED

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PUBLIC SERVICE
COMMISSION

Via Federal Express

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40601

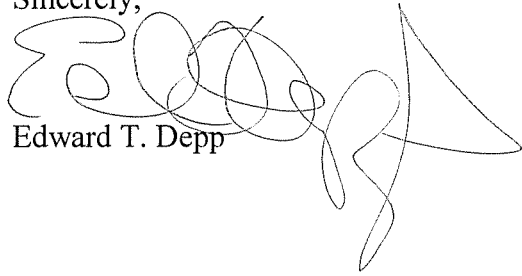
Re: RLECs v. BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky, Case No. 2011-00199

Dear Mr. Derouen:

Enclosed for filing in the above-referenced matter please find the original and eleven (11) copies of the RLECs¹ Motion for Issuance of Subpoena *Duces Tecum* to Halo Wireless, Inc.

Please file-stamp one copy and return it to our office in the enclosed, self-addressed, stamped envelope.

Sincerely,


Edward T. Depp

ETD/sdt

Enclosures

¹ Ballard Rural Telephone Cooperative Corporation, Inc., Brandenburg Telephone Company, Duo County Telephone Cooperative Corporation, Inc., Foothills Rural Telephone Cooperative, Inc., Gearhart Communications Co., Inc., Highland Telephone Cooperative, Inc., Logan Telephone Cooperative, Inc., Mountain Rural Telephone Cooperative, Inc., North Central Telephone Cooperative Corporation, Peoples Rural Telephone Cooperative, Inc., South Central Rural Telephone Cooperative Corporation, Inc., Thacker-Grigsby Telephone Company, Inc., and West Kentucky Rural Telephone Cooperative Corporation, Inc. (collectively the "RLECs").

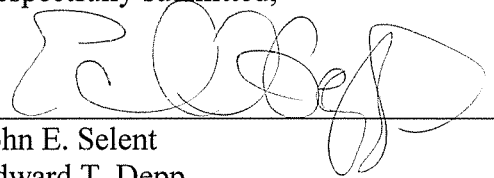
Central Rural Telephone Cooperative Corporation, Inc. ("South Central"), Thacker-Grigsby Telephone Company, Inc. ("Thacker-Grigsby"), and West Kentucky Rural Telephone Cooperative Corporation, Inc. ("West Kentucky") (collectively, the "RLECs"), by counsel and pursuant to KRS 278.320 and 807 KAR 5:001 § 3(6), hereby move the Public Service Commission of Kentucky (the "Commission") to issue a subpoena *duces tecum* to Halo Wireless, Inc. ("Halo"), ATTN: John Marks, General Counsel, 3437 W. 7th Street, Suite 127, Fort Worth, Texas 76107, compelling the production of the documents listed in Exhibit A to this Motion.

As set forth in the RLECs' Formal Complaint, filed on May 24, 2011, BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky") has been delivering third party traffic from Halo to the RLECs' networks since December 2010. The RLECs have confirmed that at least some of this Halo traffic is non-CMRS traffic for which AT&T Kentucky must compensate the RLECs at the tariffed rate. However, as set forth more fully in the RLECs' Formal Complaint, AT&T Kentucky has refused to pay for these access charges.

The call detail information listed in the attached Exhibit A is necessary for the RLECs to prove that AT&T Kentucky is terminating non-CMRS traffic from Halo that is subject to access charges. This information is also necessary for the RLECs to identify the precise nature and volume of the traffic that Halo delivers to AT&T Kentucky for termination on the RLECs' networks in Kentucky. Moreover, in past proceedings before the Commission, AT&T Kentucky has claimed its document preservation policies may make recovery of this type of information impossible. Based on the call detail records already provided by AT&T Kentucky to the RLECs, as well as AT&T Kentucky's prior representations to the Commission, it appears Halo is the only possible source of the information needed to resolve this matter.

For these reasons, the RLECs respectfully request that the Commission issue the requested subpoena, compelling Halo to produce the documents set forth in Exhibit A to this Motion. The RLECs further respectfully request that any subpoena issued require production of the documents at the offices of counsel for the RLECs within 30 days of service of the subpoena, but in any event no less than two weeks prior to the date any data requests or testimony are due to be filed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Selent", written over a horizontal line.

John E. Selent
Edward T. Depp
Stephen D. Thompson
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(502) 540-2300 (telephone)
(502) 585-2207 (facsimile)

Counsel to the RLECs

CERTIFICATE OF SERVICE

I hereby certify a true and accurate copy of the foregoing was served by first-class United States mail on the following individuals this 25th day of July, 2011.

Mary K. Keyer
General Counsel / Kentucky
601 W. Chestnut Street, Room 407
Louisville, KY 40203
Counsel for BellSouth Telecommunications, Inc.
d/b/a AT&T Kentucky

Douglas F. Brent
2000 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202-2828



Counsel to the RLECs

EXHIBIT A

CATEGORIES OF DOCUMENTS

The RLECs respectfully request that any subpoena issued by the Commission compel the production of the following six categories of documents and information from Halo Wireless, Inc. ("Halo"):

1. Produce documents sufficient to identify all carriers on whose behalf Halo delivers traffic to AT&T Kentucky for termination in Kentucky.
2. Produce documents sufficient to identify the total volume of traffic, from December 1, 2010 to the present, delivered by Halo to AT&T Kentucky for termination to the RLECs.
3. Produce documents sufficient to identify the total volume of CMRS traffic, from December 1, 2010 to the present, delivered by Halo to AT&T Kentucky for termination to the RLECs.
4. Produce documents sufficient to identify the total volume of non-CMRS traffic, from December 1, 2010 to the present, delivered by Halo to AT&T Kentucky for termination to the RLECs.
5. Produce documents sufficient to identify all RLECs, as defined in the Formal Complaint in this matter, to which Halo has had AT&T Kentucky deliver traffic on Halo's behalf.
6. For each RLEC identified in the response to Request No. 5, identify and provide documentation sufficient to identify the following:
 - (a) the total volume of monthly traffic, from December 1, 2010 to the present, terminated to that RLEC by AT&T Kentucky on behalf of Halo;
 - (b) the total volume of monthly CMRS traffic, from December 1, 2010 to the present, terminated to that RLEC by AT&T Kentucky on behalf of Halo;
 - (c) the total volume of monthly non-CMRS traffic, from December 1, 2010 to the present, terminated to that RLEC by AT&T Kentucky on behalf of Halo; and
 - (d) all originating carriers on whose behalf Halo delivered traffic to AT&T Kentucky for termination to that RLEC.