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RECEIVED

APR 16 2013

PUBLIC SERVICE
COMMISSION

April 15, 2013

VIA OVERNIGHT MAIL

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

Re: Ballard Rural Telephone Cooperative Corporation, Inc., et al.,
Complainants v. BellSouth Telecommunications, LLC, d/b/a AT&T
Kentucky, Defendant
PSC 2011-00199

Dear Mr. Derouen:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of AT&T Kentucky's Response to RLECs' Motion to Establish Procedural Schedule.

Please let me know if you have any questions.

Sincerely,


Mary K. Keyer

Enclosures

cc: Parties of Record

1077956

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:)
)
BALLARD TELEPHONE COOPERATIVE)
CORPORATION, INC., ET AL,)
)
COMPLAINANTS)
)
v.)
)
BELLSOUTH TELECOMMUNICATIONS,)
LLC D/B/A AT&T KENTUCKY,)
)
DEFENDANT)
)
AND)
)
)
BELLSOUTH TELECOMMUNICATIONS,)
LLC D/B/A AT&T KENTUCKY,)
)
THIRD PARTY COMPLAINANT)
)
v.)
)
HALO WIRELESS, INC.,)
)
THIRD PARTY DEFENDANT)

CASE NO. 2011-00199

**AT&T KENTUCKY'S RESPONSE TO RLECS' MOTION
TO ESTABLISH PROCEDURAL SCHEDULE**

BellSouth Telecommunications, LLC d/b/a AT&T Kentucky ("AT&T Kentucky"), by counsel, files this response to the Rural Local Exchange Carriers' ("RLECs") Motion to Establish Procedural Schedule, and proposes an alternative procedural schedule, attached hereto as Attachment A. The schedule proposed by AT&T Kentucky, among other items, provides for the first round of data requests to conclude on May 30, 2013,

with a subsequent discussion period for the parties to narrow issues, stipulate facts, and determine if resolution is possible. AT&T Kentucky states that its attempts to reach agreement with the RLECs on a joint procedural schedule were unsuccessful.

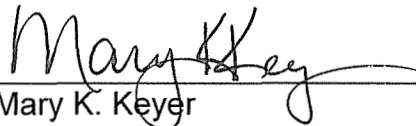
In support of its proposed schedule, AT&T Kentucky further states that in a meeting held between representatives of the parties on March 20, 2013, an exchange of traffic study information between AT&T Kentucky and one of the RLECs revealed that their information regarding the types and percentages of the relevant traffic was very closely aligned. The parties planned that the next step would be an exchange of similar information with the other RLECs, but that has not yet occurred. An exchange of such information will be helpful and necessary in facilitating further discussion among the parties to determine if they will be able to narrow the issues in the case and stipulate facts that may ultimately result in meaningful settlement discussions.

AT&T Kentucky is just as interested in getting this case concluded as the RLECs and propose a schedule that allows for the most efficient use of the parties' and the Commission's time and resources in doing so. AT&T Kentucky's proposed schedule includes a 60-day discussion period after the first round of discovery for the parties to spend their time and resources on exchanging information and engaging in meaningful discussions rather than using those resources to prepare testimony and respond to data requests that may ultimately not be necessary. While the primary goal for this discussion period is to facilitate settlement conversations, the Commission will benefit from the parties' ability to create an agreed set of facts on which to submit the case, potentially narrowing the case in a manner that would not require live witnesses or that would limit the hearing time needed.

AT&T Kentucky's proposed schedule also includes a post-hearing reply brief, which AT&T Kentucky believes will be useful to the Commission if no settlement is reached and the matter must be decided by the Commission.

Based on the above, AT&T Kentucky respectfully requests that the Commission enter the attached proposed procedural schedule.

Respectfully submitted,



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COUNSEL FOR AT&T KENTUCKY

ATTACHMENT A

AT&T KENTUCKY'S PROPOSED PROCEDURAL SCHEDULE

May 9, 2013	First Data Requests filed with the Commission and served electronically on all parties
May 30, 2013	Responses to First Data Requests due
June 1-July 31, 2013 ¹	Further Discussion Period to Narrow Issues, Stipulate Facts, and Continue Discussing Potential Settlement
August 1, 2013	Parties File Joint Status Report and Stipulation of Facts
August 15, 2013	Simultaneous Direct Testimony filed and served electronically on all parties
August 30, 2013	Second Data Requests filed with the Commission and served electronically on all parties
September 20, 2013	Responses to Second Data Requests due
October 4, 2013	Simultaneous Rebuttal Testimony filed and served electronically on all parties
October 23-24, 2013	Hearing
30 Days after Receipt of Hearing Transcript	Simultaneous Post-Hearing Briefs filed and served electronically on all parties
14 Days after Post-Hearing Briefs	Simultaneous Post-Hearing Reply Briefs filed and served electronically on all parties
60 Days after Post-Hearing Reply Briefs	Commission Decision Due

¹ This time period takes into consideration the number of parties in the case for which discussions will be necessary.

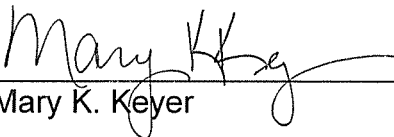
CERTIFICATE OF SERVICE – PSC 2011-00199

I hereby certify that a copy of the foregoing was served on the following individuals by mailing a copy thereof via U.S. Mail, this 15th day of April 2013.

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