

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

NOV 07 2013

PUBLIC SERVICE
COMMISSION

In the Matter of:

AT&T Corp.)
)
COMPLAINANT)
v.)
)
Mountain Rural Telephone Cooperative Corp.)
)
and)
)
Thacker-Grigsby Telephone Co., Inc.)
)
DEFENDANTS)

Case No. 2013-00_____

Motion For Expedited Telephonic Informal Conference Or Hearing
To Be Conducted November 7, 2013

AT&T Corp. (AT&T) for its motion for an expedited telephonic informal conference or hearing pursuant to 807 KAR 5:001, Section and 807 KAR 5:001, Section 9(4) states:

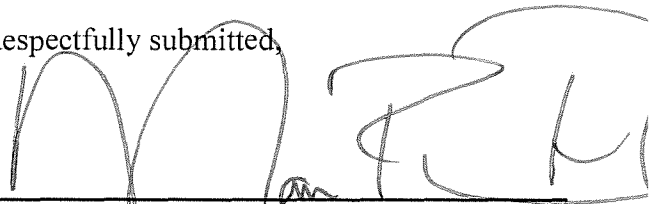
1. AT&T concomitantly is filing herewith its Complaint and Request For Expedited Relief initiating this proceeding.
2. Defendants have notified AT&T that they intend to terminate access service to AT&T on November 11, 2013 if AT&T does not pay amounts that are the subject of a bona-fide, good faith dispute between AT&T and the Defendants.
3. November 11, 2013 is a holiday and the offices of the Commission are scheduled to be closed that day. Further, local counsel for AT&T is scheduled to have surgery performed in Lexington, Kentucky on the morning of Friday, November 8, 2013 and will not be available that day.

4. Unless an emergency telephonic informal conference or hearing is conducted today, and the requested relief granted, termination of access service to AT&T on November 11, 2013 as threatened by the Defendants will prevent AT&T's long distance customers from placing AT&T long-distance calls to, or receiving long distance calls from, the Carriers' customers. It further will prevent the Carriers' customers who have chosen AT&T as their long-distance provider from making or receiving distance calls over AT&T's network.

Wherefore, for the reasons set forth above, AT&T respectfully requests the Commission to enter an Order:

1. Scheduling a telephonic informal conference or hearing on November 7, 2013 for the purpose of entering an order prohibiting the Defendants from terminating access service to AT&T on November 11, 2013 as threatened; and
2. Granting AT&T all further relief to which it may be entitled.

Respectfully submitted,



Mark R. Overstreet
STITES & HARBISON PLLC
421 West Main Street
P. O. Box 634
Frankfort, Kentucky 40602-0634
Telephone: (502) 223-3477
moverstreet@stites.com

COUNSEL FOR AT&T CORP.

CERTIFICATE OF SERVICE

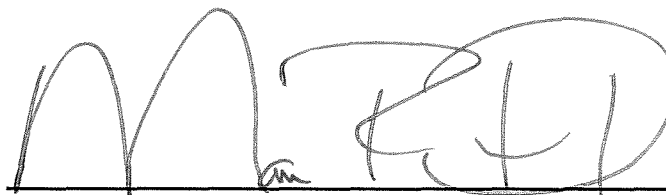
I hereby certify that a copy of the foregoing was served by first class mail, postage prepaid, and by e-mail transmission on counsel, upon the following parties, this 7th day of November, 2013.

John E. Selent
Edward T. Depp
500 West Jefferson Street , Suite 1400
PNC Plaza
Louisville, KY 40202-2810
john.selent@dinsmore.com
tip.depp@dinsmore.com

J.E.B. Pinney
Public Service Commission of Kentucky
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615
Jeb.Pinney@ky.gov

Mountain Rural Telephone Cooperative Corp.
405 West Main Street
P.O. Box 399
West Liberty, Kentucky 41472-0399

Thacker-Grigsby Telephone Company, Inc.
60 Communications Lane
P.O. Box 789
Hindman, Kentucky 41822



Mark R. Overstreet