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RECEIVED

MAY 26 2015

PUBLIC SERVICE COMMISSION

**DEVIN D. PARRAM** 614-334-6117 dparram@taftlaw.com

May 22, 2015

## Sent via Fed Ex

Jeff Derouen Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602-0615

Re: Petition of Total Call Mobile Inc. for Designation as an Eligible

**Telecommunications Carrier** 

Dear Mr. Derouen:

Enclosed please find an original and 10 copies of Total Call Mobile, Inc.'s Motion for Informal Conference with Commission Staff. A copy is included to be date-stamped and returned in the enclosed envelope. Please contact me if you have any questions about this submission.

Sincerely yours,

Devin D. Parram

By Keny Kempu

DDP/kk Enclosures

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

MAY 26 2015

PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF TOTAL CALL MOBILE,	)	
INC. FOR LIMITED DESIGNATION AS	)	CASE NO.
AN ELIGIBLE TELECOMMUNICATIONS	)	2014-00268
CARRIER	)	

## TOTAL CALL MOBILE, INC.'S MOTION FOR INFORMAL CONFERENCE WITH COMMISSION STAFF

Pursuant to 807 KAR 5:001, Section 5 and 9, Total Call Mobile, Inc. ("Total Call") respectfully requests the Commission to establish an informal conference between Total Call and Commission Staff. Total Call requests this conference to discuss the status of its application and to clarify any questions Staff may have regarding Total Call's application. Total Call request that this conference be held via telephone, and that the conference call take place on June 11, 2015 at 1:00 p.m. (EST). A memorandum in support of this request is below.

Respectfully submitted,

Mark S. Yurick (94693)

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Counsel for Total Call Mobile, Inc.

## MEMORANDUM IN SUPPORT

Pursuant to 807 KAR 5:001, Section 5 and 9, Total Call Mobile, Inc. ("Total Call") respectfully requests the Commission to establish an informal conference between Total Call and Commission Staff. 807 KAR 5:001, Section 5(1) states that "[a]ll requests for relief that are not required to be made in an application, petition, or written request shall be by motion. A motion shall state precisely the relief requested." 807 KAR 5:001, Section 9(4) states that "[t]he commission... upon a motion of a party... may convene a conference in a case for the purpose of considering the possibility of settlement, the simplification or clarification of issues, or any other matter that may aid in the handling and disposition of the case"

Total Call requests that an informal conference be held via telephone, and that the conference call take place on **June 11, 2015 at 1:00 p.m.** (EST). Total Call filed its application in this case on July 28, 2014. Staff has issued two sets of requests for information, which Total Call has responded to. Total Call believes that an informal conference will help further Staff's consideration of Total Call's application. It would also help Total Call garner a better understanding of the status of the Staff's review of the application. Total Call's goal in a conference would be to simplify and clarify any issues Staff may have, which will potentially "aid in the handling and disposition of the case." This goal is consistent with 807 KAR 5:001, Section 9(4).

Total Call proposes that the conference take place on June 11, 2015. Because most of Total Call's representatives are located in California, Total Call requests that the conference be held via telephone at 1:00 p.m. (EST). However, Total Call is more than willing to have a conference at another date if that is preferable for Staff.

Respectfully submitted,

Mark S. Yurick (94693)

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