

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

The Application of Competitive Carriers of the South, Inc. for a Declaratory Order Affirming that the Interconnection Regimes under KRS 278.530 and 47 U.S.C. § 251 are Technology Neutral

Case No. 2015-00283

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PUBLIC SERVICE
COMMISSION

**Motion by Competitive Carriers of the South, Inc.
to deviate from 807 KAR 5:001 § 8 in requesting
Electronic Filing Procedures after case initiation**

Pursuant to 807 KAR 5:001 § 22, the Applicant, Competitive Carriers of the South, Inc. (“CompSouth”), respectfully requests that the Kentucky Public Service Commission (“KPSC”) (a) permit deviation from its rule, 807 KAR 5:001 § 8(2), that a Notice of Election of Use of Electronic Filing Procedures be filed at least seven (7) days prior to submission of an application to initiate a proceeding and (b) enter an order or otherwise direct that the procedures established in Section 8 be used in lieu of other procedures established in 807 KAR 5:001. There is good cause to support the requested deviation and the use of electronic filing procedures, as follows:

1. CompSouth filed an application for a declaratory order on August 14, 2015, which was assigned Case No. 2015-00283. CompSouth did not present a Notice of Election of Use of Electronic Filing Procedures either prior to or concurrent with submission of its application.
2. By Order entered August 26, 2015, the KPSC directed that CompSouth serve a copy of its application “on all ILECs, CLECs, and CMRS [*i.e.* cellular] providers in Kentucky no later than September 14, 2015” and set October deadlines for motions to intervene, responses to the application, and replies to the responses. The KPSC database lists 20 ILECs, 187 CLECs, and 88 cellular providers in Kentucky.

3. The number of entities to which notice is to be given and the possible expansion in the participants in the proceedings — either as parties or as commenters — are changes from the situation at the time the application was filed, and provide good cause for allowing a post-initiation request for use of electronic filing procedures. It would be more efficient and equitable to use the electronic filing procedures established in 807 KAR 5:001 § 8 in lieu of paper service and filing, and would facilitate the public's ability to following the proceedings. Not only would it be less costly for a party to file and serve others in the case, but all parties would receive nearly instantaneous service regardless of their geographic location. In addition, parties and interested members of the public could sign up for and receive case filing notifications.

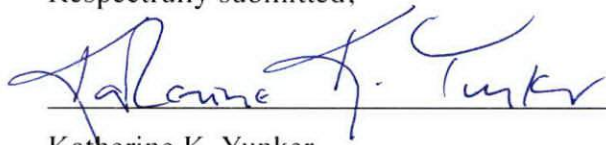
4. CompSouth intends to meet the 8/26/15 Order's deadline for service of the application on all ILECs, CLECs, and cellular providers in Kentucky. CompSouth respectfully suggests, however, that it would assist those who may want to participate in this proceeding if the KPSC extended the deadlines for motions to intervene, responses, and replies by one week with:

motions to intervene	to be filed no later than	10/12/15
responses	to be filed no later than	10/12/15
replies to responses	to be filed no later than	10/26/15

5. Attached hereto CompSouth submits a signed Notice of Election of Use of Electronic Filing Procedures.

WHEREFORE, CompSouth respectfully requests a deviation from 807 KAR 5:001 § 8(2) for good cause shown and that the KPSC enter an order or otherwise direct that the procedures established in § 8 be used in lieu of other procedures established in 807 KAR 5:001. CompSouth also respectfully suggests that the October 2015 deadlines established in the 8/26/15 Order be extended by one week.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Katherine K. Yunker", written over a horizontal line.

Katherine K. Yunker

P.O. Box 21784

Lexington, KY 40522-1784

859-255-0629

ATTORNEY FOR APPLICANT,

COMPETITIVE CARRIERS OF THE SOUTH, INC.

NOTICE OF ELECTION OF USE OF ELECTRONIC FILING PROCEDURES

(Complete All Shaded Areas and Check Applicable Boxes)

Competitive Carriers of the

In accordance with 807 KAR 5:001, Section 8, South, Inc. ("CompSouth") gives notice of its intent to file an application for _____ with the Public Service Commission no later than _____ and to use the electronic filing procedures set forth in that regulation.

CompSouth further states that:

- | | Yes | No |
|--|-------------------------------------|-------------------------------------|
| 1. It requests that the Public Service Commission assign a case number to the intended application and advise it of that number as soon as possible; N.B. Case number is 2015-00283 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. It or its authorized representatives have registered with the Public Service Commission and are authorized to make electronic filings with the Public Service Commission; | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Neither it nor its authorized representatives have registered with the Public Service Commission for authorization to make electronic filings but will do so no later than seven days before the date of its filing of its application for rate adjustment; | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. It or its authorized agents possess the facilities to receive electronic transmissions; | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. The following persons are authorized to make filings on its behalf and to receive electronic service of Public Service Commission orders and any pleadings filed by any party or the Public Service Commission Staff: | | |

Name	Electronic Mail Address
Katherine K. Yunker	yunker@desuetude.com
Carolyn Ridley	Carolyn.Ridley@Level3.com

- | | | |
|--|-------------------------------------|--------------------------|
| 6. It and its authorized representatives listed above have read and understand the procedures for electronic filing set forth in 807 KAR 5:001 and will fully comply with those procedures unless the Public Service Commission directs otherwise. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|

Signed 
 Name: Katherine K. Yunker
 Title: attorney
 Address: P.O. Box 21784
 Lexington, KY 40522-1784
 Telephone Number: 859-255-0629