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Legal Counsel.

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RECEIVED

MAR 2 2 2018

PUBLIC SERVICE COMMISSION

John E. Selent (502) 540-2315 (Direct Dial) john.selent@dinsmore.com

March 22, 2018

Via Hand Delivery

Ms. Gwen R. Pinson
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: Application of Kentucky RSA #3 Cellular General Partnership d/b/a Bluegrass Cellular for Approval to Construct and Operate a New Cell Facility to Provide Cellular Radio Service (Stephensport) in Rural Service Area #3 (Breckinridge County) of the Commonwealth of Kentucky, Case No. 2017-00143

Dear Ms. Pinson:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky are an original and eleven (11) copies of the Motion for Extension of Time filed on behalf of Kentucky RSA #3 Cellular General Partnership d/b/a Bluegrass Cellular.

Please return a file-stamped copy of these documents to our courier.

Sincerely,

John/E.

DINSMORE & SHOHL LLP

Enclosures

cc: Ron Smith (w/ att.)

Doug Updegraff (w/att.)

Tim Ash (w/ att.)

Edward T. Depp, Esq. (w/ att.)

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BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of: MAR 2 2 2018

		PUBLIC SERVICE
Application of Kentucky RSA #3 Cellular)	COMMISSION
General Partnership d/b/a Bluegrass Cellular for)	
Approval to Construct and Operate a New)	
Cell Facility to Provide Cellular Radio Service)	Case No. 2017-00143
(Stephensport) in Rural Service Area #3)	
(Breckinridge County) of the)	
Commonwealth of Kentucky, Case No. 2017-00143)	

MOTION FOR EXTENSION OF TIME

Kentucky RSA #3 Cellular General Partnership d/b/a Bluegrass Cellular ("Kentucky RSA #3"), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission") for an extension of time through and including Thursday, March 22, 2018, within which to file its comments, or otherwise respond, to the intra-agency memorandum filed by the Kentucky Public Service Commission (the "Commission"). As grounds for this motion, Kentucky RSA #3 states as follows.

Kentucky RSA #3 received notice of the intra-agency memorandum shortly before the close of business on Friday, March 16, 2018. The notice requested that Kentucky RSA #3 submit comments within five days of its receipt of the notice. Kentucky RSA #3 requires additional time to consult with its legal counsel and experts and further investigate the facts of this matter in order to sufficiently file its comments, or otherwise respond, to the intra-agency memorandum.

Additionally, Kentucky RSA #3 should be afforded this one day extension of time to file its comments because no parties will be prejudiced by the extension. On Wednesday, March 21, 2018, Kentucky RSA #3 emailed a copy of its comments to Commission Staff, Corey Biddle, and John Potts.

Therefore, Kentucky RSA #3 respectfully requests the Commission to grant its motion for an extension of time through and including Thursday, March 22, 2018, to file its comments, or otherwise respond, to the intra-agency memorandum.

Respectfully submitted,

John E. Selent
Edward T. Depp
Felix H. Sharpe, II
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Counsel to Kentucky RSA #3 Cellular General Partnership d/b/a Bluegrass Cellular

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was served via First Class United States Mail, postage prepaid, to the following individuals this 22nd day of March, 2018:

Mr. Corey M. Biddle 6070 Haysville Road Guston, Kentucky 40142

John K. Potts 204 North Main Street Hardinsburg, Kentucky 40143

> Counsel to Kentacky RSA #3 Cellular General Partnership d/b/a Bluegrass Cellular

Cella