COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION Case No. 2018-00157

In the Matter of

CMN-RUS, INC.

RECEIVED

COMPLAINANT

V.

AUG 27 2018

WINDSTREAM KENTUCKY EAST, INC.

Public Service Commission

RESPONDENT

WINDSTREAM KENTUCKY EAST, INC.'S MOTION FOR DEVIATION FROM FILING COPY REQUIREMENTS

The Respondent, Windstream Kentucky East, Inc. ("Windstream") and for its Motion for Deviation, pursuant to 807 KAR 5:001 Section 22 and the Public Service Commission's ("PSC") Order dated August 7, 2018 (the "Scheduling Order"), Paragraph 8.a., hereby states as follows:

The Scheduling Order, when read in conjunction with 807 KAR 5:001 Section 4(9), calls for the parties to this matter to respond to Requests for Information by filing an original and six paper copies with the PSC. As Windstream's Responses to the Requests for Information filed by CMN-RUS, Inc. and the PSC total 7,685 pages, Windstream requests a deviation from this rule to file the six copies on CD.

Pursuant to KAR 5:001 Section 22, "In special cases, for good cause shown, the commission may permit deviations from these rules." As Windstream's submissions, if it printed six copies on paper, would total nearly 54,000 pages, Windstream believes this is good cause to allow Windstream to file its submissions on CD. Further, Windstream has attempted shown good faith in this matter by filing the original of the documents (all 7,685 pages) in paper format in case that format is needed by the PSC in this matter. Windstream has also taken care to separate and organize the files on the CD in an attempt to maximize its usefulness and convenience.

WHEREFORE, Windstream requests that the PSC accept its filing of one original paper

copy and six copies on CD of its Responses to First Set of Request for Information from the PSC and Responses to First Set of Request for Information from CMN.

Respectfully submitted,

CASEY C. STANSBURY

TIA J. COMBS

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Counsel for Defendant,

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CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing was served on August 27, 2018 upon the following:

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