



415 Hepplewhite Dr.
Johns Creek, GA 30022
770-649-1886 / fax 770-645-6545
Eileen@Bodamer.com • www.bodamer.com

November 3, 2016

Talina R. Matthews, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

Case No. 2016-00387

Re: Interconnection Agreement Negotiated by AT&T Kentucky and Cellular Services,
LLC

Dear Executive Director Matthews:

On behalf of Cellular Services, LLC, enclosed please find an original and ten copies of a Motion for Expedited Approval of the Adoption of an Interconnection Agreement filed November 2, 2016 by AT&T Kentucky

Please call or email me with any questions,

Sincerely,

Eileen M Bodamer
Consultant to Cellular Services, LLC

Cc (email): Jim Steven, KY PSC
Ruth Conley, Cellular Services, LLC
Joe Patton, Atty. for Cellular Services, LLC

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**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**INTERCONNECTION AGREEMENT BETWEEN
AT&T KENTUCKY AND
CELLULAR SERVICES, LLC**

)
)
) **Case No. 2016-00387**
)
)

MOTION FOR EXPEDITED APPROVAL

Pursuant to Section 252(e)(1) of the Telecommunications Act of 1996 (the "Act"), 47 U.S.C. 252 (e)(1), Cellular Services, LLC¹ ("CLEC"), through its undersigned counsel, hereby requests expedited approval of its adoption of a negotiated interconnection agreement between AT&T Kentucky ("ATT") and CLEC.

CLEC is a utility within the meaning of KRS 278.010(3)(e) and is a competitive local exchange carrier authorized to provide service in Kentucky. ATT is an incumbent local exchange carrier or ILEC.

Pursuant to Section 252 (i) of the Act, CLEC adopted the terms of the Interconnection Agreement ("Adoption") between ATT and Peoples Telecom, LLC ("PTC") that was approved by the Kentucky Public Service Commission as an effective Agreement (the "Agreement") in the Commonwealth of Kentucky. That agreement was filed under PSC Reference No. 01166 and became effective on October 6, 2016.

CLEC's Adoption was filed by ATT on November 2, 2016 (PSC Reference Number yet to be assigned). Absent affirmative Commission action the Adoption becomes "approved" only by operation of federal law, after the 90 day period described in Section 252(e)(4) of the Act. Accordingly, the Agreement would not become effective until January 31, 2017. CLEC intends to operate using the Agreement as soon as possible and further delay will impede its business plans. With this application, CLEC requests that the Commission issue an order approving the negotiated agreement. Such order will expedite CLEC's expansion in the Kentucky market.

WHEREFORE, CLEC respectfully requests that the Commission issue an order on an expedited basis approving the agreement.

¹ As a point of clarification, Cellular Services, LLC is a facilities-based carrier and is not operating as a wireless provider in this matter as its name might otherwise suggest.

Dated: November 3, 2016

Respectfully submitted,



Robert Joseph Patton
Counsel for Cellular Services, LLC
Kinner & Patton Law Offices
328 E. Court St.
Prestonsburg, KY 41653 -7935.
Voice: (606) 886-1343
Fax: (606) 886-9603
Email: rjpatton@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Motion was served upon the following persons by United States mail, postage prepaid, and via email on the 3rd day of November, 2016:

Via US Mail and email:

Lora Mach, Lead Interconnection Agreements Manager
AT&T Services Inc.
311 S. Akard St., 9th Floor
Dallas, TX 75202
LP3730@att.com

Via email:

Contract Management / ATTN: Notices Manager
m41654@att.com



Eileen M Bodamer
Consultant to Cellular Services, LLC