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RECEIVED

PUBLIC SERVICE COMMISSION

JAN 0 6 2005

January 6, 2005

VIA HAND DELIVERY

Elizabeth O'Donnell Executive Director Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602

RE: An Inquiry Into the Development of Deaveraged Rates for

Unbundled Network Elements, Administrative Case No. 382

Dear Ms. O'Donnell:

Enclosed for filing please find an original and eleven (11) copies of Kentucky ALLTEL's Motion for Extension. Please return a date-stamped copy of the Motion to me.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to call.

Sincerely,

WYATT, TARRANT & COMBS, LLP

Stephanie R. Conn

Legal Secretary to James H. Newberry, Jr.

Enclosure

Motion (original and eleven copies)

cc: Amy E. Dougherty, Esq.

30318485.6



COMMONWEALTH OF KENTUCKY

JAN 0 6 2005

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INQUIRY INTO THE DEVELOPMENT)	
OF DEAVERAGED RATES FOR)	ADM. CASE NO. 382
UNRUNDLED NETWORK ELEMENTS)	

MOTION FOR AN EXTENSION

Kentucky ALLTEL, Inc. ("Kentucky ALLTEL") states as follows in support of its Motion for an Extension:

- 1. The Kentucky Public Service Commission ("Commission") previously established in this matter the following current procedural schedule:
 - a. January 7, 2005 Prefiled Rebuttal Testimony
 - b. January 25, 2005 Formal Hearing
- 2. Nuvox and Kentucky ALLTEL are the only active participants in this proceeding, and SouthEast Telephone, Inc. has withdrawn its participation.
- 3. Due in part to the complexity of the issues in this proceeding, the holiday season, and limited availability of Kentucky ALLTEL's outside consultant witness due to his present illness, Kentucky ALLTEL needs additional time in which to prepare meaningful and thorough rebuttal testimony.
- 4. Kentucky ALLTEL conferred with counsel for Nuvox Communications, Inc. ("Nuvox") and confirmed that Nuvox is not opposed to Kentucky ALLTEL's request for an extension.
- 5. Kentucky ALLTEL, therefore, requests that the current procedural schedule be amended to reflect that Prefiled Rebuttal Testimony will be filed on January 21, 2005 and

that the hearing will be rescheduled to a satisfactory date in the second half of February or later. Kentucky ALLTEL witnesses can be available the week of February 21, but Kentucky ALLTEL has not been advised and cannot presently represent whether witnesses and counsel for Nuvox are available during that week and, therefore, suggests that prior to the resetting of the hearing, that counsel for each party advise the Commission of any scheduling conflicts with respect to these or any dates the Commission may desire to schedule the hearing.

6. No harm will result from the granting of this request.

WHEREFORE, Kentucky ALLTEL requests that the Commission grant this Motion for an Extension and all other necessary and proper relief to which Kentucky ALLTEL may be entitled.

Dated this 6th day of January, 2005.

Respectfully submitted,

KENTUCKY ALLTEL, INC.

James H. Newberry, Jr.

Noelle M. Holladay

Wyatt, Tarrant & Combs, LLP Counsel for Kentucky ALLTEL, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following via regular U.S. mail postage prepaid this 6th day of January, 2005:

William Adkinson Sprint Communications Company LP 3065 Cumberland Circle, SE Mailstop GAATLD0602 Atlanta, GA 30339

Dorothy J. Chambers
BellSouth Telecommunications, Inc.
601 W. Chestnut St., Room 410
Louisville, KY 40232

Ann Louise Cheuvront 1024 Capital Center Drive Frankfort, KY 40601-8204

John N. Hughes 124 West Todd Street Frankfort, KY 40601

Rom McMillin New Edge Network, Inc. 3000 Columbia House Blvd, Suite 106 Vancouver, WA 98661-2969

Mark Romito Cincinnati Bell Telephone Company 201 East Fourth Street P.O. Box 2301 Cincinnati, OH 45201-2301

Jeffrey J. Yost Jackson Kelly, PLLC 175 East Main Street Suite 500, P.O. Box 2150 Lexington, KY 40595-000 Gene Baldrate VP - Regulatory Affairs Cincinnati Bell Telephone Co. 201 East Fourth Street Cincinnati, OH 45201-2301

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Nuvox Communications, Inc. Douglas F. Brent Stoll, Keenon & Park, LLP 2650 Aegon Center 400 West Market Street Louisville, KY 40202 Jonathon N. Amlung 1000 Republic Building 420 W. Muhammad Ali Boulevard Louisville, KY 40202

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Molle M. Holladay