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July 2, 2004

Ms. Beth O'Donnell, Executive Director Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602 JUL 0 2 2004

PUBLIC SERVICE
COMMISSION

RE: SouthEast Telephone, Inc. v. Kentucky ALLTEL, Inc.,

Case No. 2004-00093

Dear Ms. O'Donnell:

Please find enclosed for filing an original and ten (10) copies of SouthEast Telephone's Motion for Extension of Time, for filing in the above-referenced case.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions or concerns.

Cordially yours,

Jonathon N. Amlung

Enclosures

cc: Parties of record

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		
SOUTHEAST TELEPHONE, INC. Complainant)	
v.)	Case No. 2004-00093
KENTUCKY ALLTEL, INC. Respondent)))	
* * * * * *	* * *	

SOUTHEAST TELEPHONE, INC., MOTION FOR EXTENSION OF TIME TO RESPOND TO DATA REQUESTS

Comes now SouthEast Telephone, Inc. ("SouthEast"), by and through counsel, and hereby moves this Commission for an extension of time to respond to the Commission Staff data requests propounded on June 22, 2004. In support of this Motion, SouthEast states as follows:

- 1. The Commission Staff propounded certain data requests to both parties in this case on or about June 22, 2004, requiring answers within ten (10) days of the date of the requests.
- 2. The requests sought information regarding each local service request ("LSR") sent by SouthEast to Kentucky ALLTEL, Inc. ("ALLTEL"), to include customer information, processing issues and all documentation and information documenting the submission and processing of the LSR.
- 3. Due to the recent nature of these LSR requests to ALLTEL, SouthEast has not yet developed an automated system to process and document LSRs, requiring each one to be developed by hand.

- Currently, the data requested by Commission Staff requires pooling 4. together information from approximately five (5) different sources within SouthEast.
- SouthEast requires additional time to fully comply with the Commission 5. Staff requests in a meaningful and accurate manner.
- ALLTEL will not be prejudiced by a short delay in these proceedings as 6. SouthEast gathers the relevant information.

WHEREFORE, SouthEast requests an extension of time up to and including July 9, 2004, to file its responses to the Commission Staff data requests of June 22, 2004.

Respectfully submitted,

JONATHON N) AMLUNG

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CERTIFICATION

I hereby certify that a true and correct copy of the foregoing was mailed, this the day of July, 2004, to:

James H. Newberry, Jr. Noelle Holladay WYATT, TARRANT & COMBS, LLP 250 W. Main Street, Suite 1600 Lexington, KY 40507-1746

MLUNG