

**Dinsmore & Shohl** LLP  
ATTORNEYS

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RECEIVED

MAR 31 2005

PUBLIC SERVICE  
COMMISSION

March 31, 2005

**VIA HAND DELIVERY**

Hon. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
P. O. Box 615  
Frankfort, KY 40601

***Re: In the Matter of: Bluegrass Wireless LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky, before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2005-00017***

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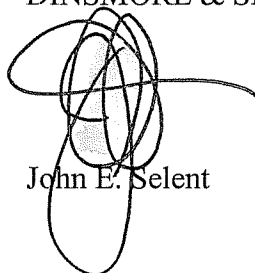
Dear Ms. O'Donnell:

Enclosed for filing in the above-styled case is an original and ten copies of a motion for extension of time on behalf of Bluegrass Wireless LLC.

Thank you, and if you have any question, please call me.

Very truly yours,

DINSMORE & SHOHL LLP



John E. Selent

JES/bmt  
Enclosure  
cc/Ron Smith  
99244v1

1400 PNC Plaza, 500 West Jefferson Street Louisville, KY 40202  
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**BEFORE THE  
KENTUCKY PUBLIC SERVICE COMMISSION**

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MAR 31 2005

PUBLIC SERVICE  
COMMISSION

*In the matter of:*

**BLUEGRASS WIRELESS LLC PETITION FOR )  
DESIGNATION AS AN ELIGIBLE )  
TELECOMMUNICATIONS CARRIER )  
IN THE COMMONWEALTH OF KENTUCKY )**

**Case No. 2005-00017**

**MOTION FOR EXTENSION OF TIME**

Applicant Bluegrass Wireless LLC (“Applicant”), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the “Commission”) for a five (5) business day extension of time through and including Friday, April 8, 2005, within which to answer the Commission’s data requests and interrogatories in the above-styled case. As grounds for this motion, Applicant states as follows.

1. Pursuant to the Commission's order of March 17, 2005, Applicant has only 14 days within which to answer the Commission’s 17 data requests and interrogatories, some with several subparts.

2. The Applicant appreciates the Commission’s desire to expedite this case, but also wants to completely and accurately answer the Commission's data requests and interrogatories. And, to do so, will take a little more time.

3. Many of the members of Applicant's management team with whom legal counsel needs to consult to answer and respond to the data requests and interrogatories are out of town all week, on the west coast, attending an annual industry conference of small wireless carriers. This makes it logistically difficult for management to review the answers to the Commission's data requests and interrogatories and the documents upon which Applicant's answers are based, and then to consult with legal counsel with respect thereto. Accordingly, Applicant has been unable

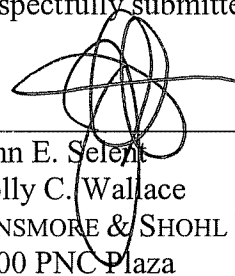
to consult fully with legal counsel regarding its answers to the Commission's data request and interrogatories.

4. This is an important matter to both Applicant and the Commonwealth of Kentucky. It is important to Applicant because the Company's ability to build out its wireless infrastructure in Kentucky may depend, in good part, upon the outcome of this case. And, it is important to the Commonwealth because Applicant is part of a consortium of affiliated companies under common local ownership or control who have really led the way in the build out of Kentucky's wireless infrastructure in their respective service territories. Consequently, it is important that Applicant respond satisfactorily and accurately to the Commission's questions, and that will take a few more days.

5. There is only one intervenor in this case and Applicant does not believe that this extension will prejudice the intervenor.

Therefore, Applicant respectfully requests the Commission to grant its motion for a five (5) business day extension of time through and including Friday, April 8, 2005 to answer the Commission's data requests and interrogatories.

Respectfully submitted,



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Holly C. Wallace  
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**Counsel to Applicant**

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and accurate copy of the foregoing was served, via United States mail, first class, postage pre-paid, this 31<sup>st</sup> day of March, 2005 on the following:

Brian Harman  
Alltel Kentucky, Inc.  
229 Lees Valley Road  
Shepherdsville, KY 40165

J. D. Tobin, Jr.  
Brandenburg Telephone Company, Inc.  
200 Telco Drive  
Brandenburg, KY 40108

William W. Magruder  
Duo County Telephone  
Cooperative Corporation, Inc.  
P.O. Box 80  
2150 N. Main Street  
Jamestown, KY 42629

F. L. Terry  
Highland Telephone Cooperative, Inc.  
7840 Morgan County Highway  
Sunbright, TN 37872

Steve Mowery  
Kentucky Alltel, Inc. - London  
Kentucky Alltel, Inc. - Lexington  
230 Lexington Green Circle  
Lexington, KY 40588-1650

Michael A. Pandow  
Lewisport Telephone Company, Inc.  
30 Pell Street  
Lewisport, KY 42351-0439

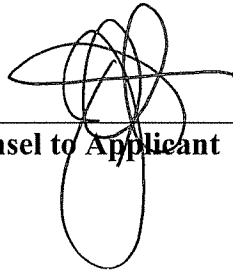
Greg Hale  
Logan Telephone Cooperative, Inc.  
10725 Bowling Green Road  
Auburn, KY 42206

F. Thomas Rowland  
North Central Telephone Cooperative, Inc.  
872 Highway 52 By-Pass  
Lafayette, TN 37083-0070

Forrest Wilson  
South Central Rural Telephone  
Cooperative Corporation, Inc.  
1399 Happy Valley Road  
Glasgow, KY 42141

Dorothy Chambers  
BellSouth Telecommunications, Inc.  
P.O. Box 32410  
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