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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: Cumberland Cellular Partnership 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. 2005-00020

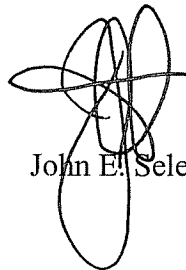
Dear Ms. O'Donnell:

Enclosed for filing in the above-styled case is an original and ten copies of a motion for extension of time on behalf of Cumberland Cellular Partnership.

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
99243v1

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MAR 31 2005

PUBLIC SERVICE COMMISSION

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

In the matter of:

**CUMBERLAND CELLULAR)
PARTNERSHIP PETITION FOR)
DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER)
IN THE COMMONWEALTH OF KENTUCKY)**

Case No. 2005-00020

MOTION FOR EXTENSION OF TIME

Applicant Cumberland Cellular Partnership (“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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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 31st 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.
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Sunbright, TN 37872

Steve Mowery
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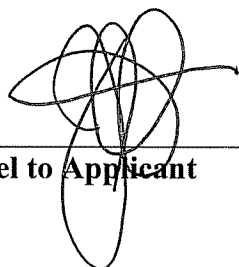
Greg Hale
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