



175 EAST MAIN STREET • P.O. BOX 2150 • LEXINGTON, KY 40588-9945 • TELEPHONE: 859-255-9500 • TELECOPIER: 859-281-6478
www.jacksonkelly.com

June 9, 2006

Via Hand Delivery

Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

RECEIVED

JUN 09 2006

PUBLIC SERVICE
COMMISSION

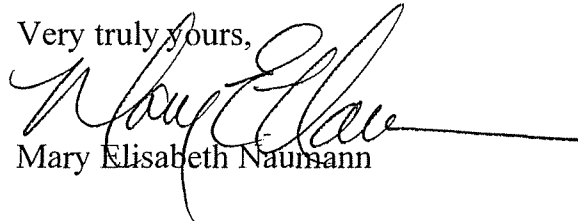
Re: PSC Case No. 2006-00202

To whom it may concern:

Please find enclosed the original and eleven copies of New Cingular Wireless PCS, LLC's Motion for Extension of Time to Answer Complaint in the above-referenced PSC proceeding. Please return a file-stamped copy with our runner.

If you should have any questions regarding this filing please call me at 859-255-9500.

Very truly yours,



Mary Elisabeth Naumann

Enclosures

RECEIVED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

JUN 09 2006

PUBLIC SERVICE
COMMISSION

In the matter of:

SUSAN LYNNE COHN)	
)	
COMPLAINANT)	
)	
v.)	CASE NO.: 2006-00202
)	
NEW CINGULAR WIRELESS)	
PCS, LLC)	
)	
DEFENDANT)	

MOTION FOR EXTENSION OF TIME
TO ANSWER COMPLAINT

Pursuant to 807 KAR 5:001 § 12(6), New Cingular Wireless PCS, LLC (“Cingular”), requests an extension of time in which it may file an answer or otherwise respond to the Complaint in the above-captioned proceedings. Cingular asserts that good cause supports such an extension and, in support of its motion, states as follows:

1. Cingular was served with the Commission’s Order to Satisfy or Answer the Complaint in this matter on June 2, 2006. Immediately upon receipt of the Complaint, Cingular initiated an investigation into its allegations, which requires the analysis of the history of the Complainant’s allegations and contacts with Cingular.

2. As of this date, Cingular is in the process of completing its investigation. In addition, Cingular would like the opportunity to attempt to resolve this matter without any further formal proceedings prior to responding to the Complaint. Such discussions could save all of the parties, including the Commission, the time and costs associated with formal

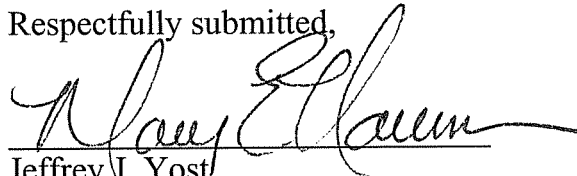
proceedings.

3. Cingular believes that a brief extension of time of 10 days will provide it with sufficient opportunity to complete its investigation and to attempt to resolve this matter without additional proceedings before the Commission.

WHEREFORE, Cingular respectfully requests an extension of 10 additional days in which to respond to the Complaint.

Dated: June 9, 2006

Respectfully submitted,

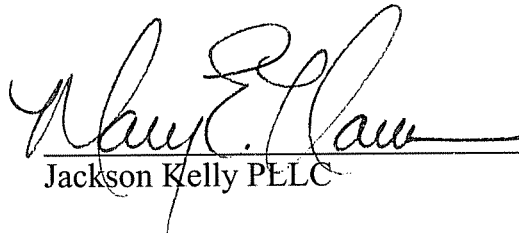


Jeffrey J. Yost
Mary Elisabeth Naumann
Jackson Kelly PLLC
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Lexington, Kentucky 40507
(859) 255-9500
*Counsel for BellSouth Mobility, LLC d/b/a
Cingular Wireless*

CERTIFICATE OF SERVICE

This is to certify that the foregoing was served by depositing a copy in the United States mail, First Class, postage prepaid and addressed to the following, on this 9th day of June, 2006.

Susan Lynne Cohn, Complainant
550 Halifax Drive
Lexington, Kentucky 40503



Jeffrey J. Yost
Jackson Kelly PLLC