

Orsp Box
RECEIVED

AUG 31 2006

PUBLIC SERVICE
COMMISSION

Dinsmore & Shohl LLP
ATTORNEYS

John E. Selent
502-540-2315
john.selent@dinslaw.com

August 30, 2006

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: Petition of West Kentucky Rural Telephone Cooperative Corporation Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with American Cellular Corporation f/k/a ACC Kentucky License LLC, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996, Case No. 2006-00220*

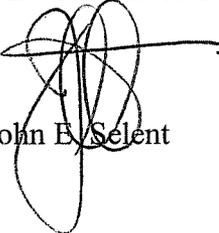
Dear Ms. O'Donnell:

West Kentucky Rural Telephone Cooperative Corporation, Inc. hereby joins in the Motion to Schedule Informal Conference filed by Ballard Rural Telephone Cooperative Corporation, Inc. in Case No. 2006-00215, a copy of which is attached hereto.

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

Very truly yours,

DINSMORE & SHOHL LLP



John E. Selent

JES/bmt
Enclosure
cc: All Parties of Record (w/enclosure)

1400 PNC Plaza, 500 West Jefferson Street Louisville, KY 40202
502.540.2300 502.585.2207 fax www.dinslaw.com

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 31 2006

PUBLIC SERVICE
COMMISSION

In the Matter of:

Petition of Ballard Rural Telephone Cooperative)
Corporation, Inc. for Arbitration of Certain Terms)
and Conditions of Proposed Interconnection)
Agreement with American Cellular Corporation)
f/k/a ACC Kentucky License LLC,)
Pursuant to the Communications Act of 1934,)
as Amended by the Telecommunications)
Act of 1996)

Case No. 2006-00215

MOTION TO SCHEDULE INFORMAL CONFERENCE

Petitioner, Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), by counsel, pursuant to 807 KAR 5:001, Section 4(4) hereby respectfully moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission") to schedule an informal conference in the above matter for the purposes of discussing, among other things: 1) the impact on the procedural schedule of the Commission's recent orders requiring Petitioner to conduct a TELRIC cost study; and 2) the advisability of bifurcating this proceeding in order to address (a) the non-cost/price issues in one part of this proceeding pursuant to the present procedural schedule and (b) the cost/price issues pursuant to a new procedural schedule in order to give the rural ILEC's time to conduct the TELRIC cost studies ordered by the Commission.

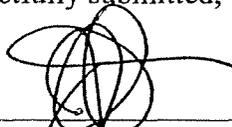
As grounds for this motion, Petitioner quotes the order of the Commission in this matter dated August 18, 2006: ". The July 25, 2006 Order remains in full force and effect with the sole exception of permitting the RLECs additional time, if needed to file their TELRIC-based cost studies and written testimony." Id. Additionally, as the testimony of Steven E. Watkins, prefiled in this matter on August 16, 2006, demonstrates, the cost involved in completing TELRIC could be in the

neighborhood of \$50,000 - \$100,000 and, more to the point, the time required to complete such studies could be several months, or more. Id. Watkins testimony at p. 11-12.

Petitioner believes such an informal conference will promote a just and efficient resolution of this matter. Finally, Petitioner asks that the parties be allowed to participate at this informal conference, at their option, either by telephone or in person.

Therefore, Petitioner asks that the Commission schedule an informal conference in this matter to be held at the earliest convenient date.

Respectfully submitted,



John E. Selent
Holly C. Wallace
Edward T. Depp
DINSMORE & SHOHL LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
(502) 540-2300 (telephone)
(502) 585-2207 (fax)

**COUNSEL TO BALLARD RURAL
TELEPHONE COOPERATIVE
CORPORATION, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first-class United States mail and electronic mail on this 30th day of August, 2006, to the following individual(s):

Jeff Yost, Esq.
Mary Beth Naumann, Esq.
Jackson Kelly PLLC
175 East Main Street
Lexington, KY 40507
jyost@jacksonkelly.com
mnaumann@jacksonkelly.com

Counsel to Cingular

Kendrick R. Riggs, Esq.
Douglas F. Brent, Esq.
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
kendrick.riggs@skofirm.com
douglas.brent@skofirm.com

Counsel to T-Mobile and Counsel to Verizon

Mark R. Overstreet, Esq.
Stites & Harbison PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
moverstreet@stites.com

Counsel to AllTel

John N. Hughes, Esq.
Attorney at Law
124 West Todd Street
Frankfort, Kentucky 40601
jnhughes@fewpb.net

Counsel to Sprint PCS

Holland N. McTyeire, Esq.
Greenbaum Doll & McDonald PLLC
3500 National City Tower
Louisville, Kentucky 40202
HNM@gdm.com

Counsel to ACC

Tom Sams
NTCH-West, Inc.
1600 Ute Avenue, Suite 10
Grand Junction, Colorado 81501
toms@cleartalk.net

Bhogan M. Modi
ComScape Telecommunications, Inc.
1926 10th Avenue North
Suite 305
West Palm Beach, FL 33461
bmodi@comscape.net



**COUNSEL TO BALLARD RURAL
TELEPHONE COOPERATIVE
CORPORATION, INC.**