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September 21, 2006

Ms. Beth A. O'Donnell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602-0615

Re: ***Comments of CMRS Providers on Intra-Agency Memorandum Concerning September 12, 2006 Informal Conference***; Case Nos. 2006-00215, 2006-00217, 2006-00218, 2006-00220, 2006-00252, 2006-00255, 2006-00288, 2006-00292, 2006-00294, 2006-00296, 2006-00298, 2006-00300

Dear Ms. O'Donnell:

Below are the joint comments of the CMRS Providers<sup>1</sup> on the Intra-Agency Memorandum ("Memorandum"), dated September 14, 2006, summarizing the September 12, 2006 Informal Conference in the above-captioned matters held at Public Service Commission in Frankfort, Kentucky. Enclosed with this original for filing purposes is one copy of this letter for each of the above-captioned dockets and ten additional copies.

The Memorandum as a whole accurately reflects the substantive discussions at the informal conference. However, the CMRS Providers propose a few corrections and clarifications as follows:

1. In the first paragraph on page 1, the discussion of Paul Walters' comments should be corrected to reflect that he said it is improper to use the interim rate as of January 1, 2007.
2. During the informal conference the CMRS Providers disputed the RLECs' claims that TELRIC studies would take 3 months and cost \$200,000 per RLEC to complete. We respectfully request that the first paragraph on page 1 reflect that we disputed those claims. We further request that the Memorandum reflect the

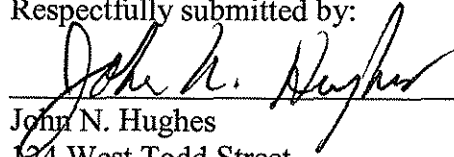
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<sup>1</sup> Alltel Communications, Inc. ("Alltel"); American Cellular Corporation ("ACC"); New Cingular Wireless PCS, LLC, successor to BellSouth Mobility LLC, BellSouth Personal Communications LLC and Cincinnati SMSA Limited Partnership d/b/a Cingular Wireless ("Cingular"); Sprint Spectrum L.P., on behalf of itself and SprintCom, Inc., d/b/a Sprint PCS ("Sprint PCS"); T-Mobile USA, Inc., Powertel/Memphis, Inc., and T-Mobile Central LLC ("T-Mobile"); and Celco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated, and Kentucky RSA No. 1 Partnership ("Verizon Wireless").

fact that the RLECs disclosed at the conference that the \$200,000 figure (per TELRIC study) includes attorneys fees, docket costs and other costs not directly related to the conduct of the TELRIC studies themselves.

3. At the top of page 2 in the discussion of the comparison of BellSouth's switching and transport rates with the FCC proxy rates, the individual providing the rates was Randy Farrar of Sprint PCS, not Bill Atkinson. This discussion of the rate comparison should also be clarified to reflect the fact that the FCC proxy rate of \$.005 cited in the last sentence is a total, approximate proxy rate derived by formula that includes transport and other elements, not just a "transport FCC proxy rate." The CMRS Providers suggest changing the phrase "whereas the transport FCC proxy rate is \$.005" in the last sentence to read "whereas the FCC proxy rate, with transport included, is approximately \$.005."
4. In the second paragraph on page 2, the reference to the AT&T case addressing third-party transit arrangements should be clarified to reflect that it involved AT&T Broadband Phone of Kentucky LLC (now Insight Phone of Kentucky LLC) and not AT&T Communications of the South Central States, LLC or another AT&T entity.
5. Based on discussions during the informal conference, the CMRS Providers understood that the due date for the updated issues matrix reflected in the last paragraph on page 2 should be September 22 (which is the same day responses to the supplemental interrogatories are due), not September 20.
6. With regard to the discussion of the pending motions on page 3, staff may wish to clarify that Petitioners decided, by letter dated September 14, 2006, not to withdraw their 251(f)(2) petition for suspension or modification of their obligation to conduct TELRIC studies.
7. In light of the Petitioner's representations at the informal conference that they were withdrawing their 251(f)(2) petition for suspension or modification of their obligation to conduct TELRIC studies, the parties did not discuss the fact that on August 25, 2006, the CMRS Providers had filed a Motion to Dismiss that petition. Given the subsequent change in position discussed above, the CMRS Carriers request that their Motion to Dismiss be noted in the memorandum as a "pending motion" as well.

Respectfully submitted by:



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Parties of Record

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on the parties listed below by electronic mail, or by depositing same in the United States mail, First Class and postage prepaid, the 21st day of September, 2006.

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