

**Dinsmore & Shohl** LLP  
ATTORNEYS

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

October 4, 2006

**RECEIVED**

OCT 04 2006

PUBLIC SERVICE  
COMMISSION

**VIA HAND DELIVERY**

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

**Re: Kentucky Public Service Commission Case Nos.  
1) 2006-00215; 2) 2006-00217; 3) 2006-00218; 4) 2006-00220;  
5) 2006-00252; 6) 2006-00255; 7) 2006-00288; 8) 2006-00292;  
9) 2006-00294; 10) 2006-00296; 11) 2006-00298; 12) 2006-00300**

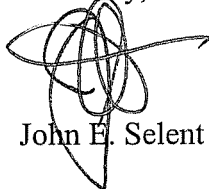
Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled cases the original and eleven (11) copies of the RLECs' motion for a one day extension of time to file rebuttal testimony. Please file-stamp one copy and return it to our delivery person.

Petitioners request that if any party objects to the Commission's granting of this motion, such party notifies counsel for the petitioners immediately.

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

Sincerely,



John E. Selent

JES:sba  
Enclosures

Hon. Beth O'Donnell  
October 4, 2006  
Page 2

---

cc: John N. Hughes, Esq.  
Mary Beth Naumann, Esq.  
Holland N. McTyeire, Esq.  
Bhogan M. Modi  
Mark R. Overstreet, Esq.  
Tom Sams  
Philip R. Schenkenberg, Esq.  
Jeff Yost, Esq.  
Amy E. Dougherty, Esq.



Petition of Gearheart Communications Inc. d/b/a )	
Coalfields Telephone Company, for Arbitration of )	
Certain Terms and Conditions of Proposed )	
Interconnection Agreement with Cellco Partnership )	
d/b/a Verizon Wireless, GTE Wireless of the )	
Midwest Incorporated d/b/a Verizon Wireless, and )	Case No. 2006-00294
Kentucky RSA No. 1 Partnership d/v/a Verizon )	
Wireless, Pursuant to the Communications Act of )	
1934, as Amended by the Telecommunications )	
Act of 1996 )	
)	
Petition of Logan Telephone Cooperative, Inc. )	
For Arbitration of Certain Terms and )	
Conditions of Proposed Interconnection )	
Agreement with American Cellular Corporation )	Case No. 2006-00218
f/k/a ACC Kentucky License LLC, Pursuant to )	
the Communications Act of 1934, as Amended )	
by the Telecommunications Act of 1996 )	
)	
Petition of Mountain Rural Telephone Cooperative )	
Corporation, Inc., for Arbitration of Certain Terms )	
and Conditions of Proposed Interconnection )	
Agreement with Cellco Partnership d/b/a Verizon )	
Wireless, GTE Wireless of the Midwest )	Case No.2006-00296
Incorporated d/b/a Verizon Wireless, and Kentucky )	
RSA No. 1 Partnership d/b/a Verizon Wireless, )	
Pursuant to the Communications Act of 1934, )	
as Amended by the Telecommunications )	
Act of 1996 )	
)	
Petition of North Central Telephone Cooperative )	
Corporation, 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 )	Case No. 2006-00252
Communications Act of 1934, as Amended by )	
The Telecommunications Act of 1996 )	

Petition of Peoples Rural Telephone	)	
Cooperative, Inc. for	)	
Arbitration of Certain Terms and	)	
Conditions of Proposed Interconnection	)	
Agreement with Cellco Partnership d/b/a Verizon	)	
Wireless, GTE Wireless of the Midwest	)	Case No. 2006-00298
Incorporated d/v/a Verizon Wireless, and	)	
Kentucky RSA No. 1 Partnership d/b/a Verizon	)	
Wireless	)	
Pursuant to the Communications Act of	)	
1934, as Amended by the Telecommunications	)	
Act of 1996	)	
	)	
Petition of South Central Rural Telephone	)	
Cooperative Corporation, Inc. for Arbitration	)	
Of Certain Terms and Conditions of Proposed	)	
Interconnection Agreement with Cellco	)	
Partnership d/b/a Verizon Wireless, GTE	)	
Wireless of the Midwest Incorporated d/b/a	)	Case No. 2006-00255
Verizon Wireless, and Kentucky RSA No. 1	)	
Partnership d/b/a Verizon Wireless,	)	
Pursuant to the communications Act of 1934,	)	
As Amended by the Telecommunications	)	
Act of 1996	)	
	)	
Petition of Thacker-Grigsby Telephone Company,	)	
Inc., for Arbitration of Certain Terms and	)	
Conditions of Proposed Interconnection Agreement	)	
with Cellco Partnership d/b/a Verizon Wireless,	)	
GTE Wireless of the Midwest Incorporated d/b/a	)	
Verizon Wireless, and Kentucky RSA No. 1	)	Case No. 2006-00300
Partnership d/b/a Verizon Wireless	)	
Pursuant to the Communications Act of 1934,	)	
as Amended by the Telecommunications	)	
Act of 1996	)	
	)	
Petition of West Kentucky Rural Telephone	)	
Cooperative Corporation, Inc. for	)	
Arbitration of Certain Terms and	)	
Conditions of Proposed Interconnection	)	
Agreement with American Cellular Corporation	)	Case No. 2006-00220
f/k/a ACC Kentucky License LLC,	)	
Pursuant to the Communications Act of 1934	)	
as Amended by the Telecommunications	)	
Act of 1996	)	

**MOTION FOR ONE DAY EXTENSION OF TIME  
TO FILE REBUTTAL TESTIMONY**

Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard"), Brandenburg Telephone Company, ("Brandenburg"), Duo County Telephone Cooperative Corporation, Inc. ("Duo County"), Foothills Rural Telephone Cooperative Corporation, Inc. ("Foothills"), Gearheart Communications Inc. ("Gearheart"), Logan Telephone Cooperative, Inc. ("Logan"), Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain"), North Central Telephone Cooperative Corporation ("North Central"), Peoples Rural Telephone Cooperative, Inc. ("Peoples"), South Central Rural Telephone Cooperative Corporation, Inc. ("South Central"), Thacker-Grigsby Telephone Company, Inc. ("Thacker-Grigsby"), and West Kentucky Rural Telephone Cooperative Corporation, Inc. ("West Kentucky") (collectively, the "Petitioners"), respectfully move the Public Service Commission of the Commonwealth of Kentucky (the "Commission") for a one-day extension of time to file rebuttal testimony in the above-styled arbitration matters. In further support of their motion, the RLECs state the following.

On August 31, 2006, the Commission issued an Order, setting forth a procedural schedule for the newly consolidated arbitration proceedings. (*See* July 25, 2006 Order at Appx. C.) As part of this schedule, the parties were ordered to file direct testimony by September 29, 2006 and rebuttal testimony by October 6, 2006. While the Commission's Order established a set procedural schedule, the Commission also recognized that circumstances might arise which could necessitate deviation from the procedural schedule upon "good cause being shown." (July 25, 2006 Order at p. 3.)

Subsequently, both the RLECs and the CMRS Providers proceeded in conformity with the Commission's Order, including submitting all direct testimony by the September 29, 2006 deadline. However, once the direct testimony was received in full, it became apparent that additional time

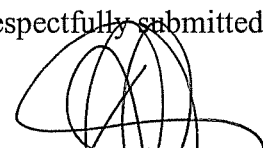
would be required to submit rebuttal testimony simply because of the sheer volume of the direct testimony and exhibits filed by the CMRS Providers, which exceeds 200 pages. Accordingly, the RLECs respectfully request one additional business day to allow sufficient time to analyze the direct testimony and prepare, file and serve the rebuttal testimony.

Moreover, granting a one-day extension of time will not require the continuance of any other procedural deadline imposed upon the parties and will not necessitate a continuance of the public hearing, which is currently scheduled to begin on October 16, 2006. Additionally, the RLECs would not oppose the CMRS Providers being granted a similar extension. Therefore, no prejudice will result to the parties or the Commission.

### **CONCLUSION**

For the foregoing reasons, the RLECs respectfully move for an extension of time until October 9, 2006 to file rebuttal testimony pertaining to the above-styled arbitration proceedings.

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)

**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 4<sup>th</sup> day of October, 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*

Phillip R. Schenkenberg, Esq.  
Briggs and Morgan, P.A.  
2200 IDS Center  
Minneapolis, MN 55402  
pschenkenberg@briggs.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.  
Greenebaum 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

Bhogan M. Modi  
ComScape Telecommunications, Inc.  
1926 10<sup>th</sup> Avenue North  
Suite 305  
West Palm Beach, FL 33461



---

**COUNSEL TO PETITIONERS**