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November 30, 2007

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DEC 03 2007

PUBLIC SERVICE
COMMISSION

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: The Application of NANPA on Behalf of the Kentucky Telecommunications Industry for Approval of NPA Relief Plan for the 270 NPA, and Number Conservation Measures within Kentucky
PSC 2006-00357

Dear Ms. O'Donnell:

Enclosed for filing are the original and ten (10) copies of AT&T Kentucky's Motion for Reconsideration.

Sincerely,


Mary K. Keyer

Enclosures

cc: Parties of Record
Industry Group

697290

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PUBLIC SERVICE
COMMISSION

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

THE APPLICATION OF NANPA ON BEHALF OF THE)	
KENTUCKY TELECOMMUNICATIONS INDUSTRY)	CASE NO.
FOR APPROVAL OF NPA RELIEF PLAN FOR THE)	2006-00357
270 NPA, AND NUMBER CONSERVATION)	
MEASURES WITHIN KENTUCKY)	

MOTION FOR RECONSIDERATION

Pursuant to KRS 278.400, BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky (“AT&T Kentucky”), on behalf of itself and the companies listed on the attachment hereto (collectively “Industry Group”), respectfully requests that the Kentucky Public Service Commission (“Commission”) reconsider the permissive dialing date of January 1, 2009, included in its November 9, 2007, order (“Order”) in this case. In support of its motion, the Industry Group states the following:

As the Commission is aware, January 1, 2009, is New Year’s Day and a national holiday. The Industry Group expects most of its customers and employees to be off work that day as well as the weekend before traveling and engaged in activities with family and friends. Implementation of permissive dialing during this busy time would be confusing for the Industry Group’s customers and problematic for its employees.

Additionally, in order to provide for permissive dialing for a new area code implementation, the Industry Group will be required to update its operating systems, which is generally performed on a weekend when it is least disruptive to

normal operations. If the Industry Group were to follow its normal procedures and update its systems on the weekend prior to implementation of permissive dialing, a January 1, 2009, implementation date would require system updates to be performed during the weekend of December 26 through 28, 2008. This would be in the middle of the busy holiday season for the Industry Group's customers and employees. Add to this the fact that the Industry Groups' systems produce numerous end-of-month and year-end reports at the beginning of the year. A January 1, 2009, implementation date for permissive dialing would further mean more confusion in an already hectic time period.


As an alternative to January 1, 2009, the Industry Group recommends the following alternative dates (in order of preference) for implementation of permissive dialing¹:

- November 16, 2008
- November 9, 2008
- December 7, 2008
- March 8, 2009
- March 15, 2009
- February 15, 2009

¹ The Commission may want to consider that an implementation date of January 1, 2009, or after, assuming a six-month interval before implementation of mandatory dialing, will place mandatory dialing and the availability of NXX codes in the 364 NPA in jeopardy based on the latest NANPA report which projects the 270 NPA to exhaust 2nd Quarter 2009.

For the reasons stated herein, the Industry Group respectfully requests the Commission to reconsider the January 1, 2009, implementation date for permissive dialing and replace it with one of the dates recommended herein.

Respectfully submitted,



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COUNSEL FOR AT&T KENTUCKY

697289

**Administrative Case No. 2006-00357
270 Area Code Relief**

INDUSTRY GROUP

AT&T Kentucky
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Ruddata Corporation
Sandy Bradford
523 S. 3rd Street
Paducah, KY 42003

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MCImetro Access Transmission
Services, LLC
(collectively referred to as "Verizon")
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5055 North Point Parkway, Floor 1
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Alltel Corporation
Sherman Tate
Vice President – State Affairs
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Windstream Kentucky East, Inc. – Lexington
Windstream Kentucky East, Inc. – London
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Atlanta, GA 30342

US LEC of Tennessee Inc.
d/b/a PAETEC Business Services
Judith Messenger
Senior Manager -- Regulatory Affairs
6801 Morrison Boulevard
Charlotte, NC 28211

CERTIFICATE OF SERVICE KPSC 2006-00357

It is hereby certified that a true and correct copy of the foregoing was served on the following individuals by mailing a copy thereof, this 30th day of November, 2007.

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