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PUBLIC SERVICE COMMISSION

VIA OVERNIGHT MAIL

Mr. Jeff Derouen **Executive Director Public Service Commission** 211 Sower Boulevard P. O. Box 615 Frankfort, KY 40602

South Central Telcom LLC, Complainant, v. BellSouth

Telecommunications, Inc., Defendant

KPSC 2006-00448

Dear Mr. Derouen:

Enclosed for filing in the above-captioned case are the original and six (6) copies of Motion of BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky.

Sincerely,

General Counsel/Kentucky

Enclosures

CC:

Party of Record

735075

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| SOUTH CENTRAL TELCOM LLC |) |
|------------------------------------|---------------------------------|
| COMPLAINANT |)) |
| v. |)) CASE NO. 2006-00448) |
| BELLSOUTH TELECOMMUNICATIONS, INC. | ,) |
| DEFENDANT | <i>)</i>) |

MOTION OF BELLSOUTH TELECOMMUNICATIONS, INC., D/B/A AT&T KENTUCKY

BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky ("AT&T Kentucky"), by counsel, respectfully requests leave to respond to some inaccuracies in the post-hearing brief filed by South Central Telcom LLC ("South Central Telcom") in this case on April 24, 2009.

AT&T Kentucky received South Central Telcom's brief on May 1, 2009, and noted misstatements of fact as well as references to information that was not presented as evidence in the hearing and would appreciate an opportunity to respond to those issues. AT&T Kentucky would propose filing its response to these issues on or before May 15, 2009, and allowing South Central Telcom an opportunity to reply to AT&T Kentucky's response on or before May 22, 2009.

WHEREFORE, AT&T Kentucky respectfully requests that the Commission grant its request for leave to file a response to the aforementioned issues contained in South Central Telcom's post-hearing brief.

Respectfully submitted,

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COUNSEL FOR BELLSOUTH TELECOMMUNICATIONS, INC., D/B/A AT&T KENTUCKY

734991

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following individual by mailing a copy thereof, this 7th day of May 2009.

Honorable John E. Selent Attorney at Law Dinsmore & Shohl, LLP 1400 PNC Plaza 500 West Jefferson Street Louisville, KY 40202

Mary K. Keyer