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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF WINDSTREAM KENTUCKY)	
EAST, LLC, FOR ARBITRATION OF AN)	CASE NO.
INTERCONNECTION AGREEMENT WITH)	2009-00246
NEW CINGULAR WIRELESS PCS,)	
D/B/A AT&T MOBILITY)	

**MOTION OF WINDSTREAM KENTUCKY, EAST LLC TO ENTER PROPOSED
AMENDED JOINT PROCEDURAL SCHEDULE**

Comes Windstream Kentucky East LLC ("Windstream"), by counsel, and hereby moves the Kentucky Public Service Commission ("Commission") to enter the attached Proposed Amended Joint Procedural Schedule. In support of this motion, Windstream states as follows:

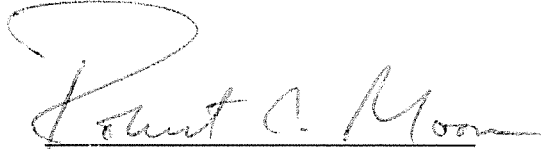
1. The Commission's Order of August 12, 2010, adopted the Joint Proposed Amended Procedural Schedule filed by Windstream and New Cingular Wireless d/b/a AT&T Mobility ("AT&T Mobility") on July 30, 2010 (hereinafter "August 12, 2010 Procedural Schedule"). The relevant portion of the August 12, 2010 Procedural Schedule provided for the parties to file responses to supplemental discovery requests on or before August 31, 2010, motions to compel (if any) on or before September 10, 2010, responses to motions to compel on or before September 17, 2010 and for the Commission to rule on any motions to compel on or before October 1, 2010.
2. Windstream's cost study witness, David Blessing, has been unavailable and unable to participate in the preparation of Windstream's answers to discovery

requests because he was out of the office the week of August 24, 2010, responding to an emergency at home, and efforts to reach Mr. Blessing on August 31, 2010, were unsuccessful due to Hurricane Earl's impact on communications systems. Mr. Blessing's participation is necessary in order to prepare Windstream's answers to AT&T Mobility's supplemental discovery requests, which concern Windstream's Updated Cost Study.

3. Windstream's answers to AT&T Mobility's discovery requests will be ready to be filed on September 17, 2010. Accordingly, Windstream requests that the August 12, 2010 Procedural Schedule be amended to allow for the filing by the parties of their respective answers to the supplemental discovery requests on or before September 17, 2010 and that the dates for the filing of motions to compel (if any) and the Commission's decision on motions to compel be adjusted.
4. AT&T Mobility and Windstream have signed the attached Proposed Amended Joint Procedural Schedule providing for the filing of the answers to the supplemental discovery requests on or before September 17, 2010, the filing of motions to compel (if any) on or before October 1, 2010, the filing of responses to motions to compel on or before October 8, 2010 and for the Commission to rule on any motions to compel on or before October 22, 2010. The remaining dates in the August 12, 2010 Procedural Schedule will remain unchanged.

5. For the reasons set forth above, Windstream hereby moves the Commission to enter the attached Proposed Amended Joint Procedural Schedule.

Respectfully submitted,



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COUNSEL FOR WINDSTREAM KENTUCKY
EAST, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent via hand delivery on this the 31st day of August, 2010 on Tiffany Bowman, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615 and by first class mail, postage pre-paid on Mary K. Keyer, General Counsel/AT&T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky 40203, on Paul Walters, Jr., 15 East 1st Street, Edmond, Oklahoma 73034.



Robert C. Moore

COMMONWEALTH OF KENTUCKY
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EAST, LLC, FOR ARBITRATION OF AN)	CASE NO.
INTERCONNECTION AGREEMENT WITH)	2009-00246
NEW CINGULAR WIRELESS PCS,)	
D/B/A AT&T MOBILITY)	

**PROPOSED AMENDED JOINT PROCEDURAL SCHEDULE OF
NEW CINGULAR WIRELESS PCS, D/B/A AT&T MOBILITY
AND WINDSTREAM KENTUCKY EAST, LLC**

New Cingular Wireless PCS, d/b/a AT&T Mobility (“AT&T Mobility”) and Windstream Kentucky East, LLC (“Windstream”) submit, and request that the Public Service Commission of Kentucky approve, the following proposed amended joint procedural schedule:

August 17	AT&T Mobility to Serve Supplemental Written Discovery Limited to Changes in Cost Study and Supporting Documentation and Windstream to Serve Written Discovery Limited to Issues Concerning Traffic Study and Supporting Documentation
September 17	Windstream Responses to AT&T Mobility Supplemental Discovery and AT&T Mobility Responses to Windstream Discovery, Including Objections, If Any
October 1	Windstream and AT&T Mobility Motions to Compel, If Any
October 8	Windstream and AT&T Mobility Responses to Motions to Compel
October 22	Commission Ruling on Motions to Compel
November 5	Windstream and AT&T Mobility Responses to Supplemental Data Requests, If Ordered.

December 10 Completion of All Depositions to Be Taken
January 21 Simultaneous Direct Testimony
February 4 Supplemental Discovery Requests (limited to new issues, if
any, raised in direct testimony or deposition)
February 18 Responses to Supplemental Discovery, Including Objections, If
Any
February 25 Motions to Compel, If Any
March 11 Responses to Motions to Compel, If Any
March 18 Commission Ruling on Motions to Compel, If Any
April 1 Responses to Supplemental Discovery, If Ordered
April 22 Simultaneous Rebuttal Testimony
Hearing June 8 and 9, 2011

Simultaneous Post-Hearing Briefs: 45 days after Receipt of Hearing Transcript.

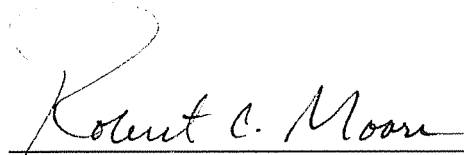
Simultaneous Post-Hearing Reply Briefs: 30 days after Post-Hearing Briefs.

Respectfully submitted,

Mary K. Keyer, by email
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