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October 11, 2013

Via Hand Delivery

Hon. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

Re: In the Matter of Ballard Rural Telephone Cooperative Corporation, Inc., et al., v BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky and Halo Wireless, Case No. 2011-00199

Dear Mr. Derouen:

With this letter I am enclosing one (1) original and eleven (11) copies of the RLECs' motion to stay the procedural schedule and request for an expedited ruling in the above matter.

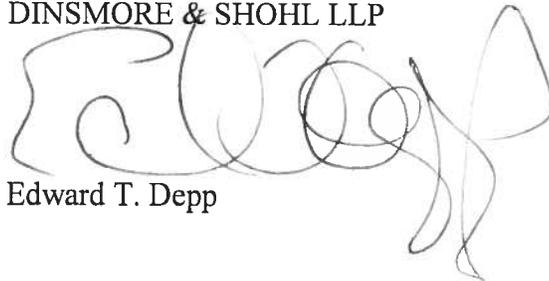
Please return a file stamped copy to our courier.

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

Sincerely,

DINSMORE & SHOHL LLP

Edward T. Depp



ETD/kwi
Enclosure

cc: All Parties of Record

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

IN THE MATTER OF:

BALLARD RURAL TELEPHONE COOPERATIVE CORPORATION, INC., ET AL.)	
)	
COMPLAINANTS)	
v.)	
)	
BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A AT&T KENTUCKY)	CASE No. 2011-00199
)	
DEFENDANT/THIRD PARTY COMPLAINANT)	
)	
v.)	
)	
HALO WIRELESS, INC.)	
)	
THIRD PARTY DEFENDANT)	

**MOTION TO STAY PROCEDURAL SCHEDULE AND REQUEST
FOR AN EXPEDITED RULING**

Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), Brandenburg Telephone Company ("Brandenburg"), Duo County Telephone Cooperative Corporation, Inc. ("Duo County"), Foothills Rural Telephone Cooperative, Inc. ("Foothills"), Gearheart Communications Co., Inc. ("Gearheart"), Highland Telephone Cooperative, Inc. ("Highland"), Logan Telephone Cooperative, Inc. ("Logan Telephone"), Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain Rural"), 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 "RLECs"), by counsel, hereby move to stay the procedural schedule in this matter and request an expedited ruling on this motion. In support of the motion and the request, the RLECs state as follows.

1. This matter comes before the Commission by formal complaint against BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky (“AT&T Kentucky”) filed by the RLECs on May 24, 2011.
2. On July 22, 2011, Bluegrass Telephone Co., Inc. d/b/a Kentucky Telephone Company (“KTC”) moved for limited intervention, which the Commission granted by Order on August 5, 2011.
3. After removal to and remand from the United States District Court for the Eastern District of Kentucky, the Commission established the present procedural schedule by Order on September 10, 2013. Additionally, due to the promulgation of new regulations that provide for only full intervention, the Commission granted KTC full intervention and provided all parties to the proceeding an opportunity to object. AT&T objected to KTC’s status as a full intervenor on September 20, 2013. KTC’s status as a party to this proceeding remains pending.
4. Although KTC’s status has not yet been resolved, the RLECs and AT&T Kentucky adhered to the procedural schedule and filed and served data requests on October 1, 2013. Responses to these requests are due to be filed on October 18, 2013.
5. Because AT&T Kentucky served data requests on KTC, it is possible that the RLECs will need to review KTC’s responses before they prepare the second round of data requests. Likewise, it is possible that KTC will propound discovery to AT&T and the RLECs that the RLECs will also want to review before the second round of data requests.
6. Additionally, a separate discovery timeline for KTC will unnecessarily complicate the procedural schedule in this matter at the expense of the Commission, the parties, and the public interest.
7. Because of these externalities associated with KTC’s disputed status as a full intervenor, the RLECs request that the Commission temporarily stay the procedural schedule.

8. In addition to encouraging an efficient preservation of the parties' and Commission staff's resources, a stay of the procedural schedule will also allow the parties an opportunity to discuss and perhaps simplify the issues in this case.

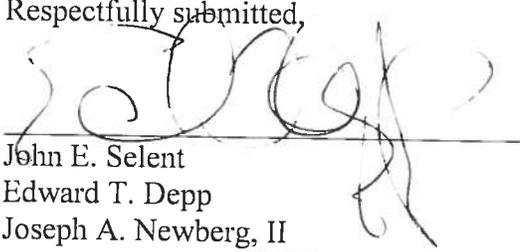
9. Once the Commission has decided the issue of KTC's intervention, the parties should confer to propose a mutually-agreeable procedural schedule to be followed on a prospective basis.

10. This motion is not made for the purpose of delay in the resolution of this matter; rather, it is in the interest of all parties to allow for the most orderly and efficient consideration of this matter.

11. Finally, because responses to initial data requests are presently due on October 18, the RLECs respectfully request an expedited ruling on this motion.

12. For all the foregoing reasons, the RLECs respectfully request that the Commission issue an order temporarily staying the existing procedural schedule and directing the parties to confer and propose a mutually-agreeable procedural schedule follow the Commission's ruling on KTC's disputed status as full intervenor.

Respectfully submitted,



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Counsel to the RLECs

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by U.S. mail this 11th day of October, 2013, on the following individuals:

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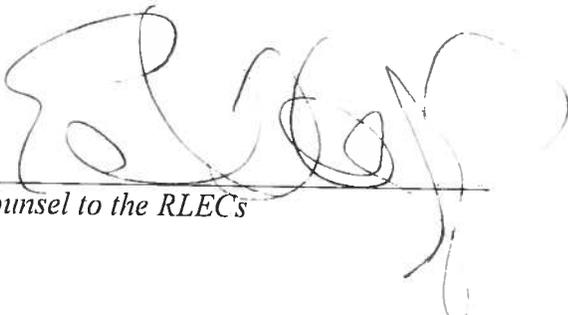
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