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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
Case No. 2018-00157

In the Matter of

CMN-RUS, INC.

COMPLAINANT

v.

WINDSTREAM KENTUCKY EAST, LLC

RESPONDENT

**WINDSTREAM KENTUCKY EAST, LLC'S MOTION FOR DEVIATION FROM
FILING COPY REQUIREMENTS CONCERNING RESPONSES TO CMN-RUS,
INC.'S SECOND SET OF REQUESTS FOR INFORMATION**

The Respondent, Windstream Kentucky East, LLC ("Windstream") and for its Motion for Deviation from Filing Copy Requirements Concerning Responses to CMN-RUS, Inc.'s Second Set of Requests for Information, pursuant to 807 KAR 5:001 Section 22 and the Public Service Commission's ("PSC") Order dated August 7, 2018 (the "Scheduling Order"), Paragraph 8.a., hereby states as follows:

The Scheduling Order, when read in conjunction with 807 KAR 5:001 Section 4(9), calls for the parties to this matter to respond to Requests for Information by filing an original and six paper copies with the PSC. As Windstream's Responses to CMN-RUS, Inc.'s Second Set of Requests for Information total 1,281 pages, Windstream requests a deviation from this rule to file the six copies on CD.

Pursuant to KAR 5:001 Section 22, "In special cases, for good cause shown, the commission may permit deviations from these rules." As Windstream's submissions, if it printed six copies on paper, would total over 7,500 pages, Windstream believes this is good cause to allow Windstream to file its submissions on CD. Further, Windstream has shown good faith in this matter by filing the original of the documents in paper format in case that format is needed by the

PSC in this matter. Windstream has also taken care to separate and organize the files on the CD in an attempt to maximize its usefulness and convenience.

WHEREFORE, Windstream requests that the PSC accept its filing of one original paper copy and six copies on CD of its Responses to CMN-RUS, Inc.'s Second Set of Requests for Information.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing was served via hand delivery on October 1, 2018 upon the following:

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