

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS	)	
COMMISSION'S TRIENNIAL REVIEW ORDER	)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS	)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS	)	

**MOTION FOR EXTENSION OF TIME**

Petitioner, BellSouth Telecommunications, Inc. ("BellSouth"), by counsel, hereby moves the Public Service Commission of Kentucky (the "Commission"), for additional time to and including December 8, 2003, to file responses to certain data requests of the Commission Staff and AT&T of the South Central States ("AT&T"). In support of its motion, BellSouth state as follows.

The Commission's Order of November 4, 2003, required responses to initial data requests in this case be filed by November 10, 2003. BellSouth filed its responses on November 10 to Commission Staff Data Requests except for Requests 1e, 2a and b and 3. There were 14 AT&T Data Requests that BellSouth did not fully respond to on November 10. In both instances, BellSouth filed a Motion requesting until December 2, 2003, to respond to the remaining Commission Staff and AT&T's data requests.

BellSouth is still gathering the data to respond to these data requests. Some of the material sought is quite voluminous. For example, the data required to respond to two of the data requests will encompass close to 36,000 pages of information. BellSouth also requests permission to include in its responses the URL for the voluminous information rather than actual copies of the material so that the parties can access the information online. BellSouth also suggests that with the paper copy of the

filing with the Commission, BellSouth provide the more voluminous material to the Commission on CD-ROM. BellSouth will indicate in the paper responses filed with the Commission which responses are provided on the CD-ROM.

BellSouth incorporates herein its Motion for Extension of Time filed on November 10, 2003, and respectfully requests the Commission grant its request for additional time to and including December 8, 2003, to respond to Commission Staff Data Requests 1e, 2a and b and 3 and the 14 AT&T Data Requests as set out in that motion. The request for additional time is not made for the purposes of delaying this proceeding.

For the foregoing reasons, BellSouth respectfully requests that its Motion for Extension of Time to and including December 8, 2003, to respond to certain Commission Staff and AT&T data requests be granted and that the Commission allow BellSouth to file the voluminous responses as indicated herein.

Respectfully submitted,



Dorothy J. Chambers  
601 W. Chestnut Street, Room 407  
P. O. Box 32410  
Louisville, KY 40232  
(502) 582-8219

R. Douglas Lackey  
Meredith E. Mays  
Suite 4300, BellSouth Center  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375  
(404) 335-0747

COUNSEL FOR BELL SOUTH  
TELECOMMUNICATIONS, INC.