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February 13, 2004

M. Thomas Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

**Re: Review of Federal Communications Commission's Triennial Review Order
Regarding Unbundling Requirements for Individual Network Elements**

Dear Mr. Dorman:

Enclosed for filing in the above-captioned case are the original and ten (10) copies of City of Williamstown Response to BellSouth Telecommunications, Inc.'s Motion to Compel.

Sincerely,

KOHNEN & PATTON LLP



Jeffrey C. Shipp

Enclosures

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FEB 17 2004

PUBLIC SERVICE
COMMISSION

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

In the Matter Of:

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

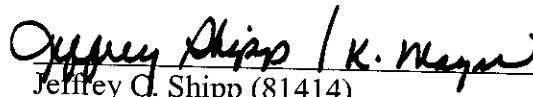
**CITY OF WILLIAMSTOWN'S
RESPONSE TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION TO COMPEL**

Comes the City of Williamstown (the "Municipality") in response to BellSouth Telecommunications motion seeking an order from the Kentucky Public Service Commission to compel various Competing Local Exchange Carriers to respond to BellSouth's discovery and makes the following response:

1. The Kentucky Public Service Commission does not have jurisdiction over the Municipality.
2. The Municipality is not a party to the proceeding and does not intend to intervene.
3. The Municipality is not a Competing Local Exchange Carrier.
4. The Municipality does not provide any telephone or related services.

Accordingly, the City of Williamstown requests that BellSouth's motion to compel be overruled, the City of Williamstown not be required to respond to the discovery requests, and the City of Williamstown be dismissed from any further proceedings.

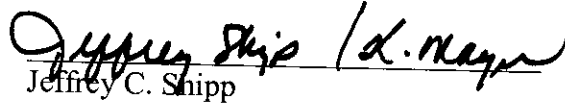
Respectfully submitted,

 / K. Mays

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(513) 381-0656

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on Dorothy J. Chambers, 601 W. Chestnut Street, Room 407, P.O. Box 32410, Louisville, KY 40203, and R. Douglas Lackey, Andrew D. Shore, and Meredith E. Mays, Suite 4300, BellSouth Center, 675 West Peachtree Street, N.E., Atlanta, GA 30375, Counsel for BellSouth Telecommunications, Inc., and those parties identified on the attached service list, by regular U.S. mail on this 13th day of February 2004.

 / K. Mays

Jeffrey C. Shipp