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February 26, 2004

FEDERAL EXPRESS

Thomas M. Dorman
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

RECEIVED

FEB 27 2004

**PUBLIC SERVICE
COMMISSION**

Re: Review of Federal Communications Commission's
Triennial Review Order Regarding Unbundling
Requirements for Individual Network Elements
PSC Case No. 2003-00379

Dear Mr. Dorman:

Please find enclosed for filing the original and ten copies of the Objection and Motion to Quash of Owensboro Municipal Utilities.

Sincerely,



Patrick D. Pace

PDP/dd

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

FEB 27 2004

REVIEW OF FEDERAL COMMUNICATIONS)
COMMISSION'S TRIENNIAL REVIEW ORDER)
REGARDING UNBUNDLING REQUIREMENTS)
FOR INDIVIDUAL NETWORK ELEMENTS)

CASE NO.
2003-00379

**PUBLIC SERVICE
COMMISSION**

OBJECTION AND MOTION TO QUASH


Owensboro Municipal Utilities ("OMU") objects to the Data Request of BellSouth and the subpoena duces tecum issued to OMU at the request of BellSouth on February 18, 2004, and moves to quash the subpoena because OMU is not a jurisdictional utility and because the subpoena is unreasonable and oppressive.

It does not appear from the Data Requests propounded that BellSouth has any reasonable basis to believe that OMU would have any information relevant to this proceeding.

Without waiving its objection, OMU states that the Data Requests are ambiguous, but that on information and belief the answers to Requests Nos. 1 and 2 are both "None."

Respectfully submitted,

KAMUF, YEWELL & PACE


Patrick D. Pace
221 West Second Street
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ATTORNEY FOR OWENSBORO
MUNICIPAL UTILITIES (OMU)

CERTIFICATE OF SERVICE

I served a copy of the foregoing Objection and Motion to Quash on Hon. Dorothy J. Chambers, General Counsel/Kentucky, BellSouth Telecommunications, Inc., 601 West Chestnut St., Room 410, P.O. Box 32410, Louisville, KY 40232 by overnight delivery, and on Hon. R. Douglas Lackey, Suite 4300, Bellsouth Center, 675 West Peachtree St., N.E., Atlanta, GA 30375, by regular mail, this 26th day of February, 2004.



Patrick D. Pace