

KY Public Service Commission

Electronic Case File Upload Utility

Documents received for Case Number: 2004-00391 have been posted to the electronic case file

BellSouth Telecommunications, Inc. dba AT

Description: Motion for Extension of Time

Items Received: 4/3/2009 2:09:21 PM

FileName	Description
Read_1st.pdf	Transmittal Letter
CCS_MOT.pdf	Motion for Extension of Time

RECEIVED

APR 08 2009

PUBLIC SERVICE
COMMISSION

RECEIVED

APR 08 2009

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

Investigation Concerning the Propriety of Provision)
of InterLATA Services by BellSouth) Case No. 2001-00105
Telecommunications, Inc., Pursuant to the)
Telecommunications Act of 1996)
)
)
Petition of BellSouth Telecommunications, Inc. for)
the Establishment of a New Performance Plan) Case No. 2004-00391

MOTION FOR EXTENSION OF TIME

The Competitive Carriers of the South, Inc. (CompSouth), through its undersigned counsel, requests a one week extension of time to file its reply in support of its Objection to BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's (AT&T-KY) declaration of a Force Majeure Event related to an incident in its St. Louis data center occurring on December 6, 2008. As grounds for this motion, CompSouth and representatives of AT&T-KY were scheduled to meet on April 3, 2009 to discuss the incident and CompSouth's objections filed in Kentucky and other Southeastern states. Under the Commission's March 11 procedural schedule, CompSouth's reply was to be filed on April 3. In light of the scheduled discussions and the possibility of settlement, CompSouth requests a brief extension. This request is not made for the purpose of delay. Counsel for AT&T Kentucky has stated that AT&T Kentucky agrees with CompSouth's request for a one week extension.

Respectfully submitted,

Douglas F. Brent

Digitally signed by Douglas F. Brent
DN: CN = Douglas F. Brent, C = US, O = Stoll
Keenon Ogdan
Reason: I am the author of this document
Date: 2009.04.03 13:54:24 -0400'

C. Kent Hatfield
Douglas F. Brent
STOLL KEENON OGDEN, PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202
Ph: (502) 568-5734
Fax: (502) 333-6099

Attorneys for CompSouth

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via upload to the Commission's Electronic Filing Portal and served via First Class Mail this 3rd day of April, 2009 to the following:

Mary K. Keyer
General Counsel
BellSouth Telecommunications, Inc.
601 W. Chestnut Street, Room 407
Louisville, KY 40203

Douglas F.
Brent

Digitally signed by Douglas F.
Brent
DN: CN = Douglas F. Brent, C
= US, O = Stoll Keenon Ogdan
Date: 2009.04.03 13:54:44 -
04'00'



STOLL · KEENON · OGDEN
P L L C

2000 PNC PLAZA
500 WEST JEFFERSON STREET
LOUISVILLE, KY 40202-2828
MAIN: (502) 333-6000
FAX: (502) 333-6099
www.skofirm.com

DOUGLAS F. BRENT
DIRECT DIAL: 502-568-5734
douglas.brent@skofirm.com

April 3, 2009

Jeff DeRouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40601

*RE: Investigation Concerning the Propriety of Provision of InterLATA
Services by BellSouth Telecommunications, Inc., Pursuant to the
Telecommunications Act of 1996 Case No. 2001-00105*

*Petition of BellSouth Telecommunications, Inc. for the Establishment of
a New Performance Plan Case No. 2004-00391*

Dear Mr. DeRouen:

Enclosed please find the original and ten copies of CompSouth's Motion for Extension of Time in the above-referenced case. The motion is identical to what has been filed electronically.

Please indicate receipt of this filing by placing your file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Very truly yours,

STOLL KEENON OGDEN, PLLC

Douglas F. Brent

Enclosure