

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

JOINT APPLICATION FOR APPROVAL)
OF THE INDIRECT TRANSFER OF)
CONTROL RELATING TO THE)
MERGER OF AT&T INC. AND)
BELLSOUTH CORPORATION)

Case No. 2006-00136

**JOINT APPLICANTS' RESPONSE TO THE MOTION OF NUVOX
COMMUNICATIONS, INC. AND DIECA COMMUNICATIONS, INC. D/B/A COVAD
COMMUNICATIONS COMPANY FOR AN ENLARGEMENT OF TIME TO FILE
DATA REQUESTS**

This filing is made in response to the motion filed by NuVox Communications, Inc. ("NuVox") and DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad") for an enlargement of time to file data requests to the Joint Applicants.

The Joint Applicants filed and served a complete and detailed Application on March 31, 2006 that provided interested parties with extensive supporting evidence demonstrating why, among other things, this indirect change of control at the holding company level will be seamless and transparent to customers, including the CLECs, will not raise any competitive concerns, and will bring significant public-interest benefits. Shortly thereafter, on April 12, this Commission established its procedural schedule. Whatever their difficulties in finding local counsel, NuVox and Covad have had ample opportunity to prepare any data requests that they desired to file in this matter once they obtained local counsel, and accordingly, there is no sound basis for their extension request.

Nonetheless, in order to avoid placing an unnecessary burden on the Commission and its Staff in resolving such a peripheral issue, Joint Applicants have elected not to oppose this motion with the understanding that NuVox and Covad are not seeking to affect the ultimate date for

disposition of this matter by the Commission and that the granting of this motion will not extend or otherwise affect that date or any other dates set by the Commission.

Respectfully submitted, this the 26th day of April 2006,

FOR BELLSOUTH CORPORATION,
BELLSOUTH
TELECOMMUNICATIONS,
INC., and BELLSOUTH LONG
DISTANCE, INC.

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