

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE)	ADMINISTRATIVE
INTRASTATE SWITCHED ACCESS RATES)	CASE NO.
OF ALL KENTUCKY INCUMBENT AND)	2010-00398
COMPETITIVE LOCAL EXCHANGE)	
CARRIERS)	

RLECs' MOTION FOR INFORMAL CONFERENCE

In response to the March 10, 2011 Order (the "Order") of the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in the above-captioned case (the "Intrastate Access Case"), the RLECs¹ respectfully request that the Commission schedule an informal conference for all participants in the Intrastate Access Case prior to the May 2, 2011 deadline for filing the first round of data requests. In support of their motion, the RLECs state as follows.

I. Grounds for Informal Conference.

807 KAR 5:001(4)(b)(4) provides that "[i]n order to provide opportunity for settlement of a proceeding or any of the issues therein, an informal conference with the commission staff may be arranged through the secretary of the commission either prior to, or during the course of hearings in any proceeding, at the request of any party." *Id.* (emphasis added). The RLECs believe that an informal conference will help all participants involved resolve potential confusion regarding aspects of the AT&T Plan and focus the issues for the proceeding going forward. As

¹ Ballard Rural Telephone Cooperative Corporation, Inc.; Brandenburg Telephone Company; Duo County Telephone Cooperative Corporation, Inc.; Foothills Rural Telephone Cooperative, Inc.; Gearhart Communications Co., Inc.; Highland Telephone Cooperative, Inc.; Logan Telephone Cooperative, Inc.; Mountain Rural Telephone Cooperative, Inc.; North Central Telephone Cooperative Corporation; Peoples Rural Telephone Cooperative, Inc.; South Central Rural Telephone Cooperative Corporation, Inc.; Thacker-Grigsby Telephone Company, Inc.; and West Kentucky Rural Telephone Cooperative Corporation, Inc. (collectively the "RLECs").

AT&T² itself stated when it recommended the AT&T Plan to the Commission, it hoped to “assist the Commission in investigating the [] issues... [and] to facilitate discussions among the Parties participating in this proceeding.” Comments of AT&T, Filed December 17, 2010. An informal conference would provide the perfect opportunity to accomplish this goal.

In particular, an informal conference would provide an opportunity for the parties in this case to ask questions regarding the AT&T Plan, to seek clarification from AT&T regarding their understanding of it, or to address any other issues involved in this proceeding. Prior to the exertion of significant time, effort, and resources to issue data requests and testimony in this proceeding, an informal conference will allow the parties to resolve and narrow the issues going forward. The Commission has customarily held informal conferences at the inception of cases for these same purposes. Due to the significance of the issues involved and their wide-reaching effects, the RLECs believe an informal conference under the auspice of the Commission and its expert staff would be in the best interest of all parties participating in this case by ensuring that the issues are clear and that the ultimate outcome of this proceeding, whatever it may be, is truly to the benefit of the citizen of the Commonwealth.

Finally, the RLECs’ request for an informal conference would not cause a procedural delay in this case as it would fall in between the filing of comments on April 15, 2011 and the first round of data requests, which are scheduled to be filed by May 2, 2011. The RLECs believe that an informal conference would best serve the parties if it occurred prior to the deadline for filing the first round of data requests because it will provide the parties additional information for the purpose of focusing their data requests and, subsequently, their direct testimony.

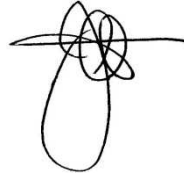
²BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky, AT&T Communications of the South Central States, LLC, BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service, and TCG Ohio (collectively “AT&T”).

II. Conclusion.

For all of the reasons stated above, and pursuant to 807 KAR 5:001(4)(b) (4), the RLECs request that the Commission schedule an informal conference for all participants in the Intrastate Access Case prior to the May 2, 2011 deadline for filing the first round of data requests.

The RLECs encourage all other participants in this proceeding to join in this motion.

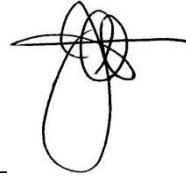
Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with Ordering Paragraph No. 5 of the Commission's March 10, 2011 Order, this is to certify that the RLECs' April 15, 2011 electronic filing is a true and accurate copy of the documents to be filed in paper medium; that the electronic filing has been transmitted to the Commission on April 15, 2011; that an original and one copy of the filing will be delivered to the Commission on April 15, 2011; and that, on April 15, 2011, electronic mail notification of the electronic filing will be provided through the Commission's electronic filing system.



Counsel to the RLECs
