

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 TO AMEND THE PROCEDURAL SCHEDULE
TO ALLOW FOR SUPPLEMENTAL COMMENTS**

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 amend the procedural schedule to allow for the filing of supplemental comments on AT&T's² proposed plan (the "AT&T Plan") following the close of the comment period at the federal level on May 23, 2011. In support of their motion, the RLECs state as follows.

I. Grounds for Amending Procedural Schedule to Allow for Supplemental Comments.

As the Commission is aware, parallel proceedings are underway at the federal level to address intercarrier compensation issues.³ Those proceedings are currently in a comment and review period that will close on May 23, 2011. The Federal Communications Commission ("FCC") has requested comments on, among other issues, interstate access reform as well as different approaches for states to follow in implementing intra-state access reform. On both

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").

² BellSouth 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").

³ See *In re Connect America Fund: A National Broadband Plan for Our Future*, 2011 WL 466775 (Notice of Proposed Rulemaking, rel. Feb 9, 2011).

counts, the direction of the parallel federal proceedings will have profound implications for the participants in this case and will provide essential context for the general import of the AT&T Plan.

In particular, the treatment of inter-state access rates will have a direct effect on cost recovery at the state level. A decrease in interstate rates will serve to increase the financial strain on the RLECs and other carriers as cost recovery is further shifted to local and intrastate rates. Moreover, the FCC has requested comments on such essential issues as the proper sequencing (whether inter-state and intra-state reform should occur at the same time or sequentially) and timing (whether a shorter or a longer glide path will be used to transition from per-minute intercarrier charges) for reform.

Due to the symbiotic nature of interstate and intrastate rates as they relate to cost recovery, the comments submitted to the FCC on these issues will further illuminate the path forward in this proceeding. The RLECs, as well as the other participants in this proceeding, need to know what the rules of the game are likely to be – or, at least, what others are advocating they should be – at the federal level before they can adequately address, comment on, or propose alternatives to the AT&T Plan. Likewise, the Commission should make certain that it is, itself, fully aware of the degree to which whatever action it takes in this proceeding may be further exacerbated by the FCC's pending reform.

In order for the participants in this proceeding to comment fully and with confidence on the AT&T Plan, and to ensure the Commission is fully apprised of the potential impact of the present proceeding, the RLECs respectfully request the Commission amend the procedural schedule to allow for supplemental comments on the federal comment period disclosed on May 23, 2011. Allowing for a supplemental comment period in this proceeding will not cause further

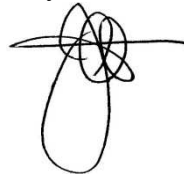
delay in the Commission's current procedural schedule, as it can be scheduled for a time prior to the August 5, 2011 due date for the second round of data requests. This will allow the parties time to incorporate information gleaned from the federal comments into their second round of data requests. It will also serve to ensure that whatever decision the Commission makes in this proceeding is one that accounts for the full-range of variables that are at play in intercarrier compensation reform.

II. Conclusion.

For the reasons stated above, the RLECs request that the Commission amend the procedural schedule to allow for filing supplemental comments on AT&T's proposed plan (the "AT&T Plan") after the close of the comment period at the federal level on May 23, 2011 and prior to the August 5, 2011 deadline for serving supplemental data requests.

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

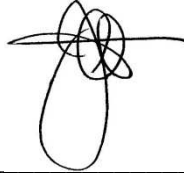
Respectfully submitted,



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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