

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' REPLY BRIEF IN SUPPORT OF MOTION FOR RECONSIDERATION OR REHEARING PURSUANT TO KRS 278.400 AND 807 KAR 5:001 Section 4(10)

In support of the RLECs' Motion for Reconsideration or Rehearing (the "Motion for Reconsideration"), filed in the above-captioned case on June 1, 2012 before the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in response to the May 30, 2012 Order (the "May 30 Order"), the RLECs state as follows.

Although AT&T² denies that it misrepresented the April 19 FCC Order³ to this Commission, it provides no authority whatsoever to support its denial. (See AT&T's Response to the RLECs' Motion for Reconsideration or Rehearing, p. 2 (the "Opposition").) As a result, AT&T cannot plausibly deny that it misled this Commission, nor can it rebut the unambiguous meaning of the April 19 FCC Order which provided worksheets for use with "inter state" filings and expressly stated that NECA carriers like the RLECs are not required to use the worksheets. (April 19 FCC Order, ¶¶ 1, 28.)

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 AT&T Kentucky, AT&T Communications of the South Central States, LLC, AT&T Long Distance Services, and TCG Ohio (collectively, "AT&T").

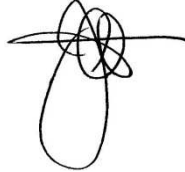
³ See *In the Matter of Material to be Filed in Support of 2012 Annual Access Tariff* filings, WCB/Pricing File No. 12-08, Order, ¶ 1 (rel. April 19, 2012) (the "April 19 FCC Order").

The simple truth is that the RLECs have already submitted all required information to the Commission. Tellingly, AT&T does not deny this.

Moreover, implicit in the Commission's May 30 Order was the practical concern that standardized worksheets would ensure that the Commission would not be forced to review a multitude of different formats of cost support information. However, this concern is already resolved because the RLECs, a significant majority of Kentucky's ILECs,⁴ presented their data in a standardized format that complies with the FCC's express substantive requirements.

In short, there is no legal requirement or practical reason for the Commission to require the RLECs to perform the unnecessary clerical task of moving their cost support data to non-required worksheets. For these reasons, and the reasons set forth more fully in the RLECs' Motion for Reconsideration or Rehearing, the RLECs respectfully request that the Commission grant this motion and retract ordering paragraphs 2 and 3 of the May 30 Order.

Respectfully submitted,

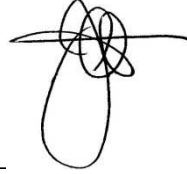


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⁴ AT&T characterizes the RLECs as "several RLECs." (Opposition, p. 2.) In fact, the RLECs include 13 separate carriers, which constitute a majority of ILECs filing revised intrastate tariffs with the Commission.

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' June 18, 2012 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 June 18, 2012; that an original and one copy of the filing will be delivered to the Commission on June 18, 2012; and that, on June 18, 2012, electronic mail notification of the electronic filing will be provided through the Commission's electronic filings system.



Counsel to the RLECs
