

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

An Investigation into the Intrastate Switched
Access Rates of All Kentucky Incumbent and
Competitive Local Exchange Carriers

Adm. Case No. 2010-00398

Motion of Level 3 for Extension of Time

Level 3 Communications, LLC (“Level 3”), through its undersigned counsel, hereby moves for a two-week extension of time in which to comply with the Commission’s May 30, 2012 Order. In support of this motion, Level 3 states as follows:

1. Ordering ¶ 1 of the May 30, 2012 Order (“5/30/12 Order”) states: “No later than June 1, 2012, all affected parties shall file their proposed intrastate access tariffs containing an effective date of July 3, 2012.” 5/30/12 Order p. 6. The tariff filings are to be accompanied by supporting information requested by the Commission, including but not limited to Fiscal Year 2011 intrastate demand for each rate element included in “Transitional Intrastate Access Service”; all intrastate access rates in effect as of December 29, 2011; all interstate access rates in effect as of December 29, 2011; and a full description of the methodology the carrier will use to set revised rates to reflect the calculated revenue reduction. *Id.* at 7.

2. On the short notice given, Level 3 is unable to gather and adequately present all of the information requested by the Commission prior to the June 1, 2012 deadline in the 5/30/12 Order. Moreover, the undersigned has been unable to speak with Level 3’s in-house personnel who will be involved in the preparation of the tariff and requested information. As a result, Level 3 requests a reasonable extension to comply with the 5/30/12 Order.

3. In addition to the flexibility that has been granted by the Commission to competitive telecommunications service providers with respect to proposed tariff revisions, KRS 278.180(2) authorizes the Commission (“upon application of any utility”) to allow less than 30 days’ notice within which a reduction of rates may be made.

4. Level 3 represents that it will file its proposed intrastate access tariff, along with the supporting information requested by the Commission, as it is completed and will not necessarily wait until June 15, 2012, to file and serve such information.

WHEREFORE, Level 3 respectfully requests a two-week extension of the deadline set out in the Commission’s 5/30/12 Order, up to and including June 15, 2012.

Respectfully submitted on behalf of Level 3:

/s/ Katherine K. Yunker

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