

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

In the Matter of:

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

**WINDSTREAM KENTUCKY EAST, LLC AND  
WINDSTREAM KENTUCKY WEST, LLC’S RESPONSE TO THE JOINT MOTION BY  
TWTC, LEVEL 3 COMMUNICATIONS, AND PAETEC FOR EXTENSION OF TIME**

---

Windstream Kentucky East, LLC (“Windstream East”) and Windstream Kentucky West, LLC (“Windstream West”) respond as follows to the Joint Motion by TWTC, Level 3 Communications and PAETEC (collectively, the “CLECs”) requesting an extension of time in which to submit their discovery responses:

1. Although they do not concur with the characterizations set forth in the Joint Motion, Windstream East and Windstream West do not object to the CLECs’ ultimate request for an extension of time in which to submit their discovery responses on or before June 24, 2011.
2. The parties’ respective counsel have agreed that Windstream East and Windstream West may hold their discovery responses to the CLECs and exchange them at the same time that the CLECs provide their responses to the discovery served by the Windstream companies.
3. Windstream East and Windstream West reserve the right to plead further in this matter as may be necessary.

Pursuant to the foregoing, Windstream East and Windstream West request that the Commission grant the Joint Motion to the extent it seeks an extension of the time for filing the CLECs’ discovery responses and correspondingly, that the Commission permit a similar allowance

for the time in which Windstream East and Windstream West will file their responses to the discovery served on them by the CLECs.

WHEREFORE, Windstream East and Windstream West respectfully request that the Commission enter all necessary orders granting the relief as requested herein.

Respectfully submitted,

s/Robert C. Moore  
HAZELRIGG & COX, LLP  
415 West Main Street, 1st Floor  
P. O. Box 676  
Frankfort, Kentucky 40602-0676  
(502) 227-2271