

Attachment 3

**T. Taylor letter to R. Stack
dated 1-22-16**



Tony Taylor
Executive Director
External & Legislative Affairs

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Robert Stack, Director
Division of Enhanced 911
Lexington-Fayette Urban County Government
200 E. Main St., Room 313
Lexington, KY 40507

Dear Mr. Stack,

As you know, AT&T Kentucky has petitioned the Kentucky Public Service Commission (KPSC) in Case No. 2015-00227 to declare that in order for the Central Kentucky Network (CKN) to direct 911 calls from AT&T Kentucky customers to a PSAP or otherwise to provide 911 service to a PSAP that serves an area served by AT&T Kentucky, CKN must obtain a certificate of convenience and necessity under KRS 278.020 and must enter into an interconnection agreement with AT&T Kentucky under 47 U.S.C. § 252. Consistent with discussions during the informal conference that you and I attended, KPSC Staff Attorney JEB Pinney circulated last week a draft schedule for the case that calls for rebuttal testimony in May, 2016, so that a Commission decision would be issued some time after that.

AT&T Kentucky understands, of course, that CKN opposes the relief that AT&T Kentucky seeks in Case No. 2015-00227. As matters now stand, however, if the KPSC grants that relief, CKN would then need to request negotiation of an interconnection agreement with AT&T Kentucky pursuant to 47 U.S.C. § 252(a). Hopefully, the parties would then be able to arrive at a negotiated agreement without undue delay. It is not unusual, however, for the formation and approval of an interconnection agreement under 47 U.S.C. § 252(e) to take several months.

In order to minimize the potential for delay, AT&T Kentucky urges CKN to submit a section 252(a) request for negotiation to AT&T Kentucky as soon as practicable, so that the parties can start to negotiate.¹ If the KPSC ultimately concludes that CKN does not need an interconnection agreement, then of course the parties will not execute one. But if the KPSC decides that CKN needs an interconnection agreement, CKN and AT&T Kentucky may have one ready for execution by the time the KPSC renders its decision; at a minimum, we will have advanced the process by many months.

If CKN wishes to request negotiation, please proceed as explained at the following webpage: <https://clec.att.com/clec/shell.cfm?section=27>. As stated there, you may either submit a

¹ AT&T Kentucky would request negotiation with CKN, but I am informed by counsel that the federal Telecommunications Act does not permit that.

written letter including enumerated pieces of information or access and send a simple form letter available on the webpage. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony O'Neil". The signature is written in a cursive style with a large, looped "O" and a long, sweeping tail.