

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

In the Matter of:

APPLICATION OF BELLSOUTH)	
TELECOMMUNICATIONS, LLC FOR)	
DECLARATORY RULING REGARDING)	Case No. 2015-00227
INTERCONNECTION WITH CENTRAL)	
KENTUCKY NETWORK FOR 911/E911)	
SERVICES TO PUBLIC SAFETY)	
ANSWERING POINTS)	

**AT&T KENTUCKY’S MOTION
TO HOLD PROCEEDING IN ABEYANCE**

BellSouth Telecommunications, LLC d/b/a AT&T Kentucky (“AT&T Kentucky”) respectfully moves to hold this proceeding in abeyance to allow time for AT&T Kentucky, CKN, and other interested parties to pursue a possible amicable resolution of the issues raised in this case. In support of this Motion, AT&T Kentucky states as follows.

1. AT&T Kentucky filed the Petition that initiated this case, which arose from certain concerns regarding requests from Public Safety Answering Points (“PSAPs”) to begin routing AT&T Kentucky’s end-users’ 911 calls to the Central Kentucky 911 Network (“CKN”) rather than directly to the PSAPs.

2. AT&T Kentucky submitted written testimony by Mr. J. Scott McPhee, and Mr. Robert Stack filed written testimony on behalf of the Lexington-Fayette Urban County Government (“LFUCG” or “Lexington”).

3. Based on Mr. Stack’s testimony, discovery responses by LFUCG, and confidential settlement discussions, AT&T Kentucky believes an amicable solution to the PSAP requests that led to this proceeding is possible, in which case the issues raised by AT&T Kentucky’s Petition could be resolved without requiring a Commission decision.

4. In order to confirm that is so, AT&T Kentucky needs to test the proposed solution with a few county PSAPs to make sure all sides are amenable to it. That will take time. At present, however, AT&T Kentucky's rebuttal testimony would be due this Friday, August 17, 2016.

5. Accordingly, in order to pursue a potential resolution of the case without the need for further testimony, AT&T Kentucky requests that this proceeding be held in abeyance for 120 days. AT&T Kentucky will provide the Commission with a status report after 60 days and 90 days in order to keep the Commission apprised of events and whether it may be likely to reconvene the proceeding.

6. AT&T Kentucky has spoken with counsel for LFUCG (which operates CKN and is the only party that filed testimony responding to AT&T Kentucky, and LFUCG does not oppose holding this proceeding in abeyance as AT&T Kentucky proposes. No party will be prejudiced by holding the proceeding in abeyance and seeking to amicably resolve or moot the issues raised in AT&T Kentucky's Petition.

WHEREFORE, AT&T Kentucky respectfully moves that the procedural schedule be suspended and that this case be held in abeyance for 120 days.

Respectfully submitted,

/s/ Cheryl Winn
Waters Law Group, PLLC
12802 Townepark Way, Suite 200
Louisville, KY 40243
Telephone: (502) 425-2424
Facsimile: (502) 425-9724
crwinn@waterslawgroup.com

Dennis G. Friedman
J. Tyson Covey
Mayer Brown LLP

71 South Wacker Drive
Chicago, IL 60606
Telephone: (312) 782-0600
Email: dfriedman@mayerbrown.com
jcovey@mayerbrown.com

FILING NOTICE AND CERTIFICATE

The undersigned hereby certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing was transmitted to the Commission on August 8, 2016; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Cheryl R. Winn