

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

The Application of Competitive Carriers of the)
South, Inc. for a Declaratory Order Affirming that)
The Interconnection Regimes under KRS 278.530) Case No. 2015-00283
and 47 U.S.C. § 251 are Technology Neutral)

**VERIZON'S MOTION TO STRIKE COMPSOUTH'S MOTION
TO COMPEL AND REQUEST FOR ADDITIONAL RELIEF**

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (Verizon) joins in AT&T Kentucky's Motion to Strike CompSouth's Motion to Compel because CompSouth failed to confer with Verizon's counsel and attempt to work out disputes before filing its Motion. For the reasons stated in AT&T Kentucky's Motion to Strike, CompSouth's Motion to Compel should be stricken because CompSouth has violated Commission rules that require counsel to confer before seeking to compel discovery responses. Verizon also joins in AT&T Kentucky's Motion that the procedural schedule in this case be suspended because CompSouth unilaterally decided not to file rebuttal testimony when due without prior Commission approval. Verizon agrees with AT&T Kentucky that a status conference should be convened to determine how to proceed now that CompSouth has disregarded the Commission's case schedule. Finally, Verizon joins in the request that the Commission rule on the Motions to Strike on an expedited basis, or alternatively suspend the due date for responses.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the same document being sent for filing in paper medium with the Commission, that the electronic filing was transmitted to the Commission on December 12, 2016 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Luke Morgan
ATTORNEY FOR VERIZON