

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>APPLICATION OF COMPETITIVE CARRIERS OF )</b>	
<b>THE SOUTH, INC. FOR A DECLARATORY ORDER )</b>	<b>CASE NO.</b>
<b>AFFIRMING THAT THE INTERCONNECTION )</b>	<b>2015-00283</b>
<b>REGIMES UNDER KRS 278.530 AND 47 U.S.C. § 251 )</b>	
<b>ARE TECHNOLOGICALLY NEUTRAL )</b>	

---

**RESPONSE TO MOTION FOR ORAL ARGUMENTS**

---

Comes now the Competitive Carriers of the South, Inc. (“CompSouth”), by counsel, and in response to the Motion for Oral Arguments filed by BellSouth Telecommunications, LLC, d/b/a AT&T Kentucky (“AT&T Kentucky”) on March 24, 2017, respectfully states as follows:

CompSouth objects to AT&T Kentucky’s motion. The parties have had ample opportunity to state their respective positions on the issues of statutory construction raised in this proceeding in their briefs. Any further process will shed no new light on the parties’ positions, but will result in additional – and unnecessary – cost and delay. AT&T Kentucky’s motion should be denied.

WHEREFORE, on the basis of the foregoing, CompSouth respectfully requests that AT&T Kentucky’s motion for oral arguments be denied.

This 27<sup>th</sup> day of March, 2017.

Respectfully submitted,



---

David S. Samford  
L. Allyson Honaker  
GOSS SAMFORD, PLLC  
2365 Harrodsburg Road, Suite B-325  
Lexington, KY 40504  
(859) 368-7740  
david@gosssamfordlaw.com  
allyson@gosssamfordlaw.com

*Counsel for Competitive Carriers of the South, Inc.*

CERTIFICATE OF SERVICE

This is to certify that foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on March 27, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being hand delivered to the Commission on the 27<sup>th</sup> day of March, 2017.



---

*Counsel for Competitive Carriers of the South, Inc.*