

**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>	

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**RESPONSE TO MOTION TO SUSPEND  
DATE FOR INITIAL BRIEFS**

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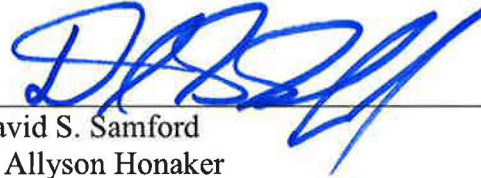
Comes now the Competitive Carriers of the South, Inc. (“CompSouth”), by counsel, and in response to the Motion to Suspend Date for Initial Briefs and Request for Expedited Ruling filed by BellSouth Telecommunications, LLC, d/b/a AT&T Kentucky (“AT&T Kentucky”) on February 24, 2017, respectfully states as follows:

CompSouth filed its application for a Declaratory Order over eighteen (18) months ago. With AT&T’s filing of an unsupported motion to strike most of CompSouth’s rebuttal testimony and the intervenors’ motion to suspend the existing briefing deadline, the intervenors are once again seeking to delay the proceeding and increase the cost of litigating what is a straightforward question of law. Nevertheless, CompSouth recognizes that AT&T’s filing of the motion to strike will likely mandate some extension of the briefing deadline will be necessary. Accordingly, consistent with the parties’ discussion with Staff at the telephonic informal conference held on March 10, 2017, CompSouth does not object to a brief two-week extension of the deadline for filing briefs.

WHEREFORE, on the basis of the foregoing, CompSouth respectfully states that it does not object to a brief, two-week extension of the deadline to file briefs.

This 7<sup>th</sup> day of March, 2017.

Respectfully submitted,



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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 7, 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 7<sup>th</sup> day of March, 2017.



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