COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF COMPETITIVE CARRIERS OF)
THE SOUTH, INC. FOR A DECLARATORY ORDER)
AFFIRMING THAT THE INTERCONNECTION)
REGIMES UNDER KRS 278.530 AND 47 U.S.C. § 251)
ARE TECHNOLOGICALLY NEUTRAL)

CASE NO. 2015-00283

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 27th day of March, 2017.
Respectfully submitted,

[Signature]

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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 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 27th day of March, 2017.

[Signature]

Counsel for Competitive Carriers of the South, Inc.