

**BEFORE THE KENTUCKY  
PUBLIC SERVICE COMMISSION**

In the matter of

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

**MOTION FOR ORAL ARGUMENT**

AT&T Kentucky<sup>1</sup> respectfully moves the Commission to schedule oral argument in this proceeding and states as follows in support of its motion:

1. As explained in the Initial Brief contemporaneously filed by AT&T Kentucky, the issues in this case are predominantly legal.

2. Because the case presents predominantly legal issues, AT&T Kentucky believes it would be appropriate and helpful to the Commission to hear oral argument from the parties' legal counsel.

3. In an Order entered August 9, 2016, on an AT&T Kentucky motion concerning briefing and a possible oral argument, the Commission stated (at pp. 2-3), "The Commission will also schedule a hearing in this case, and, depending upon the result of discovery and briefing, will reserve the option of amending the hearing to include oral arguments."

4. The parties subsequently agreed to forego an evidentiary hearing. Consequently, oral argument would be the only opportunity for the parties to present their positions live to the Commission and to address any questions or concerns the Commission may have.

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<sup>1</sup> BellSouth Telecommunications, LLC, d/b/a AT&T Kentucky

Accordingly, AT&T Kentucky respectfully urges the Commission to set a date for oral argument in this case.<sup>2</sup>

Respectfully submitted,

/s/ Cheryl R. Winn  
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### **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 March 24, 2017; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Cheryl R. Winn

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<sup>2</sup> Half a day should be sufficient for oral argument. AT&T Kentucky is available to attend oral argument any day between April 3-11 or any day in May.