

**BEFORE THE KENTUCKY  
PUBLIC SERVICE COMMISSION**

In the matter of

Application of Competitive Carriers of the     )  
South, Incl. 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     )

**JOINT MOTION TO SUSPEND CURRENT PROCEDURAL SCHEDULE AND  
WITHDRAWAL OF PENDING MOTIONS WITHOUT PREJUDICE.**

The undersigned parties to this proceeding, having agreed to the withdrawal of the pending motions described below without prejudice, respectfully move the Commission to enter an Order suspending the current procedural schedule and state as follows:

1. On December 7, 2016, Applicant CompSouth<sup>1</sup> filed a motion to compel discovery responses from Intervenors AT&T Kentucky<sup>2</sup> and Verizon<sup>3</sup> and to extend the procedural schedule.
2. On December 9, 2016, AT&T Kentucky filed a motion to strike CompSouth's motion to compel and to suspend the procedural schedule and set a status conference.
3. On December 12, 2016, Verizon filed a motion to strike CompSouth's motion to compel.
4. On December 15, 2016, CompSouth filed a Notice relating to the foregoing motions.

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<sup>1</sup> Competitive Carriers of the South, Inc.

<sup>2</sup> BellSouth Telecommunications, LLC d/b/a AT&T Kentucky.

<sup>3</sup> MCIMetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services.

5. CompSouth, AT&T Kentucky and Verizon have now agreed that CompSouth will confer separately with AT&T Kentucky and with Verizon about CompSouth's discovery issues with each of those Intervenor with a view toward eliminating or at least narrowing the parties' differences. To that end, CompSouth hereby withdraws without prejudice the motion to compel it filed on December 7 and the Notice it filed on December 15, and AT&T Kentucky and Verizon hereby withdraw without prejudice the motions to strike they filed on December 9 and December 12, respectively.

6. CompSouth will confer with AT&T Kentucky and with Verizon about CompSouth's discovery issues with each of those Intervenor during approximately the next week. If discovery issues remain, CompSouth intends to file a new motion to compel relating to those issues, and the briefing will proceed in accordance with the Commission's rules, subject to the parties' rights to seek such extensions of time as may be appropriate. After the Commission rules on the new motion to compel, if any, the parties will attempt to agree on a revised schedule for the remainder of the case to submit for the Commission's approval.

7. If CompSouth's conferences with AT&T Kentucky and Verizon resolve all discovery issues, the parties will then attempt to agree on a revised schedule for the remainder of the case to submit for the Commission's approval.

8. The current procedural schedule includes a December 7 date for rebuttal testimony and a December 28 date for submission of briefs. The parties agree that in light of the ongoing discovery activity, these dates cannot hold. Accordingly, the parties respectfully move the Commission to enter an Order suspending the current procedural schedule in its entirety.

HAVE SEEN AND AGREED TO:

/s/ Cheryl R. Winn

Waters Law Group, PLLC  
12802 Townepark Way, Suite 200  
Louisville, KY 40243  
Telephone: (502) 435-2424  
Email: [crwinn@waterslawgroup.com](mailto:crwinn@waterslawgroup.com)  
Co-Counsel for BellSouth  
Telecommunications, LLC

Dennis G. Friedman

J. Tyson Covey

Mayer Brown LLP

71 South Wacker Drive

Chicago, IL 60606

Telephone: (312) 782-0600

Email: [dfriedman@mayerbrown.com](mailto:dfriedman@mayerbrown.com)

[jcovey@mayerbrown.com](mailto:jcovey@mayerbrown.com)

Co-Counsel for BellSouth  
Telecommunications, LLC

/s/ David S. Samford (with permission)

David S. Samford  
L. Allyson Honaker  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B-325  
Lexington, KY 40504  
Telephone: (859) 368-7740  
Email: [david@gosssamfordlaw.com](mailto:david@gosssamfordlaw.com)  
Counsel for Competitive Carriers of the  
South, Inc.

/s/ Luke Morgan (with permission)

Luke Morgan  
McBrayer, McGinnis, Leslie & Kirkland,  
PLLC  
201 East Main Street, Suite 900  
Lexington, KY 40507  
Telephone: (859) 231-8780  
Email: [lmorgan@mmlk.com](mailto:lmorgan@mmlk.com)  
Counsel for MCI Communications Services,  
Inc.  
d/b/a Verizon Business Services

/s/ Douglas E. Hart (with permission)

Douglas E. Hart  
441 Vine Street, Suite 4192  
Cincinnati, OH 45202  
Telephone: (513) 621-6709  
Email: [dhart@douglasshart.com](mailto:dhart@douglasshart.com)  
Counsel for Cincinnati Bell Telephone  
Company LLC

**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 December 23, 2016; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Cheryl R. Winn