

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**VERIZON’S REQUEST FOR LEAVE TO
SUPPLEMENT THE RECORD WITH CITATIONS**

Comes the Intervenor, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services LLC (“Verizon”), and requests leave of the Commission to provide it with time for Verizon to supplement the record herein with citations that are in contrast with or otherwise offer explanation to the cases the Applicant put into this record by a filing dated January 12, 2016. Verizon requests to have up to and including **February 5, 2016** to provide the Commission with citations or other explanations regarding those references recently provided by the Applicant.

Verizon requests this leave in response to the Applicant’s filing, January 12, 2016. Verizon recognizes the citations referenced in the Applicant’s filing may have been unavailable to the Applicant – or any of the parties – during the initial briefing period which closed approximately 45 days before the Applicant’s filing was made. The citations’ previous unavailability, however, should not be allowed to permit the Applicant to present the Commission with arguments from foreign jurisdictions, without challenge from Verizon (or any other party).

Counsel for the Applicant has stated to the undersigned that she does not object to Verizon’s instant request. Moreover, Verizon’s instant request for leave to address the citations is authorized and recognized by 807 KAR 5:001 Section 5(2), as well as Verizon’s overarching due process right to have a meaningful opportunity to address issues and arguments raised by the

parties to the matter. *American Beauty Homes Corp. v. Louisville and Jefferson County Planning and Zoning Commission*, 379 S.W.2d 450, 456 (Ky. 1964).

WHEREFORE, this Intervenor requests an opportunity to address the supplemental citations recently offered by the Applicant, which had not been cited (or available) to the parties when the initial briefing was conducted and closed, and to give Verizon leave to supplement the record on or before **February 5, 2016**.

Respectfully submitted,

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BY: /s/ Luke Morgan
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the same document being sent for filing in paper medium with the Commission, that the electronic filing was transmitted to the Commission on January 20, 2016, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Luke Morgan
ATTORNEY FOR INTERVENORS