In the Matter of:

The 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 Technology Neutral

Case No. 2015-00283

Motion by Competitive Carriers of the South, Inc.
for Extension of Time

The Applicant, Competitive Carriers of the South, Inc. (“CompSouth”), respectfully requests a one-week extension of the reply deadline, to November 2, 2015. In support of this request, the Applicant states as follows:

1. By Order entered August 26, 2015, the Kentucky Public Service Commission (“Commission”) set deadlines of October 5, 2015, for motions to intervene and responses to the Application and of October 19, 2015, for replies to responses. As part of its Motion to deviate from 807 KAR 5:001 § 8 in requesting Electronic Filing Procedures after case initiation, CompSouth suggested that each of those deadlines be extended by a week. In its Order dated September 24, 2015, the Commission inter alia extended the replies deadline to no later than October 26, 2015.

2. The CompSouth participants have been working diligently to prepare a reply to the responses, but anticipate that they will need additional time. As things turned out, the two-week reply period fell at a time when the participant personnel devoted to this proceeding were unavailable for significant and overlapping parts of the period. Review, incorporation of feed-
back, and approval of the reply for filing by all the CompSouth participants will take time beyond the four working days left before the current deadline expires.

3. Replies to the responses may also come from the existing responders or from other interested persons. So that all are working with the same deadline, CompSouth respectfully suggests that the Commission extend the deadline for everyone, with replies to responses to be filed no later than Monday, November 2, 2015.

WHEREFORE, CompSouth respectfully requests a one-week extension of the deadline for replies to responses, to and including November 2, 2015.

Respectfully submitted,

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CERTIFICATE OF SERVICE AND FILING

I certify that the foregoing is a true and accurate conformed 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 October 20, 2015, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Katherine K. Yunker
Attorney for Applicant