September 13, 2016

Dr. Talina R. Matthews  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
P. O. Box 615  
Frankfort, KY 40601

Re: In the Matter of an Inquiry into the State Universal Service Fund, Case No. 2016-00059

Dear Dr. Matthews

Enclosed for filing is Nexus Communications, Inc.’s Motion to Withdraw from the above docket. As noted in the Motion, Nexus has ceased providing service in the state and is no longer an Eligible Telecommunications Carrier in Kentucky or any other state.

Sincerely,

/s/ Danielle Frappier

Danielle Frappier  
Counsel to Nexus Communications, Inc.
COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INQUIRY INTO THE STATE UNSERVICES FUND ) CASE NO. 2016-00059
UNIVERSAL SERVICE FUND )

MOTION TO WITHDRAW

Nexus Communications, Inc. ("Nexus") moves to withdraw from participation in the above-referenced case. In its Order initiating this case, the Commission made each local exchange carrier, commercial mobile radio service provider, and eligible telecommunications carrier ("ETC") a party to this proceeding. The Commission also provided an opportunity to any party that is not an ETC in Kentucky receiving both federal universal service fund ("USF") and state support to file a written request setting forth the reasons why withdrawal as a party is appropriate. Order, p. 6. Nexus moves to withdraw and states such reasons below.

A. Nexus Is Not an ETC

Nexus is no longer an ETC in Kentucky, and as a result, it does not receive state or federal USF support for services provided in the state. Therefore, it meets the threshold requirement to withdraw from this proceeding.

B. Nexus Does Not Provide Service in Kentucky

Nexus no longer provides any services in Kentucky. There is therefore no value in requiring it to respond to data requests for which it will have no substantive comments.

C. Nexus’ Withdrawal as a Party Is Appropriate

As noted above, Nexus is not an ETC in Kentucky and does not provide any services whatsoever in the state. Requiring it to respond to data requests for which it has no substantive data to report would be wasteful exercise that would needlessly consume the time and energy of the Commission and Nexus. Nexus therefore moves to withdraw.

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1 An Inquiry into the State Universal Service Fund, Order, Case No. 2016-00059, February 1, 2016 ("Order").

D. Conclusion

For the reasons stated above, Nexus respectfully requests that it be permitted to withdraw from further participation in this proceeding.

Respectfully submitted this 13th day of September, 2016.

/s/ Danielle Frappier
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