

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

MOTION TO WITHDRAW AND FOR EXTENSION OF TIME

Tennessee Independent Telecommunications d/b/a iRis Networks (“iRis”) hereby respectfully moves the Kentucky Public Service Commission (“Commission”) to permit its withdrawal, or to dismiss it, from the above-referenced matter. In support of its motion, iRis submits the following:

1. iRis is a party pursuant to the Commission’s February 1, 2016 Order (the “*Order*”) establishing this inquiry into Kentucky’s Universal Service Fund (“KUSF”).

2. At page six of the *Order*, the Commission stated that it would allow each carrier that is not an eligible telecommunications carrier (“ETC”) in Kentucky an opportunity to withdraw from this case. iRis is not an ETC in Kentucky and does not receive federal Universal Service Fund or state support.¹

3. As a carrier not participating in the Lifeline program, iRis cannot materially contribute to the Commission’s investigation.

4. iRis will monitor any compliance items affected by the proceeding, but hereby requests to be dismissed as a party.

5. Pursuant to 807 KAR 5:001, Section 10, under the circumstances presented iRis also requests an extension of time. In the event the Commission does not dismiss iRis as a party,

¹ iRis does not serve end-users in Kentucky, is not an ETC in Kentucky, and does not receive KUSF support.

iRis requests a ten (10) day extension of time to respond to the Commission Staff's data requests otherwise due on September 16, 2016.

For the foregoing reasons, and for good cause shown, iRis respectfully requests that the Commission grant it permission to withdraw from further participation in this proceeding.

Respectfully submitted:



Melvin J. Malone / BPR #13784
Virginia D. Ryan / KB #95651
Butler Snow LLP
150 3rd Avenue South, Suite 1600
Nashville, TN 37206
(615) 651-6705
melvin.malone@butlersnow.com

Attorneys for Tennessee Independent Telecommunications
d/b/a iRis Networks