

**BEFORE THE PUBLIC SERVICE COMMISSION
COMMONWEALTH OF KENTUCKY**

In the Matter of:

**AN INQUIRY INTO THE STATE
UNIVERSAL SERVICE FUND**

Case No. 2016-00059

MOTION FOR EXTENSION OF TIME

Bluegrass Wireless LLC, Cumberland Cellular Partnership, Kentucky RSA #3 Cellular General Partnership, and Kentucky RSA #4 Cellular General Partnership, all d/b/a Bluegrass Cellular (collectively “Bluegrass Cellular”), by counsel, hereby move for an extension of time until Friday, May 29, 2020, at the latest, to submit their responses to the Commission’s requests for information in its order of May 11, 2020. In support of this motion, Bluegrass Cellular states as follows.

1. Bluegrass Cellular and its counsel did not receive notice of this matter’s May 11 order until it arrived alongside this matter’s order on May 21.
2. Bluegrass Cellular appreciates the urgency and importance of this matter and appreciates the Commission’s attention to it for the benefit of the Commonwealth and its citizens in this unprecedented time.
3. Upon receipt, Bluegrass Cellular and counsel immediately began to diligently prepare responses to the requests for information appended to the Commission’s May 11 order.
4. However, due to the upcoming Memorial Day weekend, knowledgeable Bluegrass Cellular personnel have not been immediately reachable.

5. Bluegrass Cellular anticipates that it will be able to compile the requested information and provide responses by the end of next week, if not earlier, and will endeavor to do so as soon as possible.

6. Good cause therefore exists for a very short extension of the amended response deadline, to no later than May 29. And, again, Bluegrass Cellular will endeavor to do so well before May 29.

WHEREFORE, Bluegrass Cellular respectfully requests that the Commission grant an extension of the amended response deadline to Friday, May 29, 2020, at the latest, and Bluegrass Cellular will endeavor to respond much earlier.

Respectfully submitted,

/s/ John E. Selent
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