

**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

Comes Sage Telecom Communications, LLC dba TruConnect (TruConnect) by counsel and moves to withdraw from participation in the above-referenced case and to remain on the service list. 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 gave any party that is an ETC in Kentucky that is not receiving state support from the Kentucky Universal Service Fund (KUSF) the opportunity to file a written request setting forth the reasons why withdrawal as a party is appropriate. TruConnect moves to withdraw and to remain on the service list for the reasons stated below.

Reasons Why Withdrawal as a Party and an Extension of Time is Appropriate

TruConnect, although approved as an ETC in Kentucky, is not currently receiving state support from the KUSF. It therefore has minimal interest in the level of state support provided to ETCs that do receive subsidies. Moreover, TruConnect does not currently have customers in the state of Kentucky. As such, TruConnect has no direct level of interest in the surcharge changes proposed in the Order. After reviewing the Order and considering the likely economic impact of this proceeding on TruConnect's operations, TruConnect has determined that it is not in its interests to participate at this time,

however, due to possible future participation in the KUSF, TruConnect would like to remain on the service list. TruConnect therefore moves to withdraw and remain on the service list for this proceeding.

With respect to the extension of time, TruConnect sought out local undersigned Kentucky legal counsel in bringing this motion and it took a limited amount of time beyond the February 26, 2016 deadline to secure same. Accordingly, TruConnect respectfully requests a short extension of time for filing this motion, which was to have been electronically filed by February 26, 2016. All other motions filed on that date remain pending, and an extension for TruConnect to request its withdrawal will not prejudice any parties to the case.

Wherefore, for the reasons stated above, TruConnect respectfully requests that it be granted a seven day extension for filing and be permitted to withdraw from further participation in this proceeding, while remaining on the service list.

Respectfully submitted,

/s/ Matthew Malone
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**CERTIFICATE OF SERVICE AND ACKNOWLEDGEMENT OF
ELECTRONIC FILING PROCEDURES**

In accordance with 807 KAR 5:001 § 8, I certify that the March 4, electronic filing of the foregoing is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Commission on March 4, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of this document will be mailed to the Commission by first class United States mail, postage prepaid, on March 4, 2016.

I further certify that I am the authorized agent for the entity filing this Motion and possess the facilities to receive electronic transmissions.

/s/ Matthew Malone _____
Matthew Malone