

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:)

AN INQUIRY INTO THE STATE)
UNIVERSAL SERVICE FUND)

Case No. 2016-00059

**MOTION TO BELATEDLY FILE NOTARIZED VERIFICATIONS OF DATA
REQUEST WITNESSES BY Q LINK WIRELESS, LLC,
GLOBAL CONNECTION INC. OF AMERICA D/B/A STANDUP WIRELESS,
AIRVOICE WIRELESS, LLC DBA FEEL SAFE WIRELESS, AMERIMEX
COMMUNICATIONS CORP. DBA SAFETYNET WIRELESS, I-WIRELESS, LLC, DBA
ACCESS WIRELESS AND SAGE TELECOM COMMUNICATIONS, LLC DBA
TRUCONNECT**

Q LINK Wireless, LLC, Global Connection Inc. of America dba StandUp Wireless, Airvoice Wireless, LLC dba Feel Safe Wireless, Amerimex Communications Corp. dba SafetyNet Wireless, i-wireless, LLC dba Access Wireless and Sage Telecom Communications, LLC dba TruConnect (together “Kentucky ETCs”) hereby move for additional time to submit notarized verifications for data request witnesses involved in answering the Commission’s requests for information in the Order entered May 11, 2020. In support of its Motion, the Kentucky ETCs state:

1. The deadline to respond to the eight questions contained in the Appendix of the Order is now May 25, 2020 (by more recent Order).
2. Usual and normal practice for responding to data requests before the Commission requires any witness responding to attest via notary that, “the matters and things set

forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.”

3. The Kentucky ETCs have submitted their finalized data request responses separately and contemporaneously with this motion.
4. However, the data request responding witnesses are currently unable to obtain a notary in short order because of the COVID-19 pandemic and corresponding limitations.
5. The Kentucky ETCs respectfully request that they may submit their witness verifications via a notice of filing to the Commission no later than June 15, 2020.
6. This request is made in good faith and not for purposes of delay.

WHEREFORE, the Kentucky ETCs respectfully request that the Commission enter an Order allowing the Kentucky ETCs to provide witness verifications to the data request responses no later than June 15, 2020 by separate notice of filing.

Dated: May 26, 2020

Respectfully submitted,

/s/ Lance J.M. Steinhart

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And

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TruConnect (“Kentucky ETCs”)*

CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Section 6, the undersigned certifies that consistent with 807 KAR 5:001 Section 4(8)(d)(3), a copy of this document has been electronically served upon the parties and counsel of record on May 26, 2020 by service through the electronic filing portal:

/s/Matt Malone
ATTORNEY FOR KENTUCKY ETCs