

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:)	
)	
AN INQUIRY INTO THE STATE)	Case No. 2016-00059
UNIVERSAL SERVICE FUND)	

**SECOND 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 a second time to submit notarized verifications for data request witnesses involved in answering the Commission’s most recent requests for information. Alternatively, the Kentucky ETCs respectfully request the option to submit the verifications under penalty of perjury with no notary if one is not available because of COVID-19 restrictions. In support of its Motion, the Kentucky ETCs state:

1. 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.”

2. The Kentucky ETCs previously submitted their finalized data request responses separately without the notarized verifications.
3. By previous request, the Commission allowed the Kentucky ETCs to file belated notarized verifications through June 15, 2020.
4. However, some of the data request responding witnesses are still currently having difficulty obtaining a notary because of the COVID-19 pandemic and corresponding limitations.
5. Filed by a separate “notice of filing” contemporaneously are notarized verifications on behalf of StandUp Wireless and Q-Link Wireless, LLC.
6. The remaining Kentucky ETCs respectfully request that they may submit their notarized witness verifications via a notice of filing to the Commission no later than June 19, 2020 or alternatively submit them under penalty of perjury without a notary depending on availability due to COVID-19 no later than June 19, 2020.
7. 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 remaining Kentucky ETCs to provide witness verifications to the data request responses no later than June 19, 2020 by separate notice of filing or alternatively no later than June 19, 2020 submit them under penalty of perjury without a notary due to COVID-19 restrictions.

Dated: June 15, 2020

Respectfully submitted,

/s/ Lance J.M. Steinhart

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And

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Wireless, i-wireless, LLC dba AccessWireless and
Sage Telecom Communications, LLC dba
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 June 15, 2020 by service through the electronic filing portal:

/s/Matt Malone
ATTORNEY FOR KENTUCKY ETCs