

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 FOR EXTENSION OF TIME 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 an extension of time until May 25, 2020 to submit its responses to the Kentucky Public Service Commission’s (“Commission”) request for information in the Order entered May 11, 2020 (the “Order”). 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 May 18, 2020.
2. While the Kentucky ETCs are in the process of compiling responses to the data requests, they need more time to adequately respond than is currently allocated under the Order.

3. Extending the response period will enable the Kentucky ETCs to provide a more thorough response. The requested extension will not unduly delay the Commissions goal of determining whether additional voice minutes and data would provide a public health benefit during the COVID-19 state of emergency.
4. 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 extending the time for responses by one week and grant a new deadline for the Kentucky ETCs response of May 25, 2020.

Dated: May 18, 2020

Respectfully submitted,

/s/ Lance J.M. Steinhart

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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 18, 2020 by service through the electronic filing portal:

/s/Matt Malone
ATTORNEY FOR KENTUCKY ETCs