COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INQUIRY INTO THE STATE UNIVERSAL SERVICE FUND ) CASE NO. 2016-00059

CAMPUS COMMUNICATIONS GROUP, INC.

MOTION TO WITHDRAW

The Commission, in its February 1, 2016 Order initiating this case, made every 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 not an ETC in Kentucky receiving both federal and state universal service fund ("USF") support the opportunity to file a written request setting forth the reasons why withdrawal as a party is appropriate. Campus Communications Group, Inc. ("CCG"), through undersigned counsel, hereby respectfully requests that the Commission grant this late filed motion to withdraw from this proceeding.

In support of this request, CCG states as follows:

CCG is registered with the Commission as local exchange carrier; however, CCG is not currently conducting business in the state. When CCG initiates operations in Kentucky, it will primarily provide Internet access and VoIP services to commercial customers. CCG does not currently anticipate providing traditional local exchange service. CCG is not an ETC in Kentucky, does not provide Lifeline services, and does not receive either federal or state USF support. Therefore, CCG meets the Commission’s threshold for withdrawal from this proceeding.

Because CCG does not receive state USF support, it has no direct interest in the level of state support provided to ETCs. Moreover, as noted, CCG does not provide subscriber lines to the public. CCG has not collected USF funds from customers in Kentucky and currently reports zero subscriber lines and zero USF surcharges each month. Thus, CCG is not directly affected by changes to the Kentucky USF assessment. Accordingly, CCG seeks to withdraw from further participation in this proceeding.
For the reasons state above, CCG respectfully requests that it be permitted to withdraw from further participation in this proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE AND ACKNOWLEDGEMENT OF ELECTRONIC FILING PROCEDURES

In accordance with 807 KAR 5:002, Section 8, I certify that the September 14, 2016 electronic filing of this Motion 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 September 14, 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 Motion will be provided to the Commission via overnight courier on September 14, 2016.

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Michael P. Donahue
Counsel for Campus Communications Group, Inc.