COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:		
AN INQUIRY INTO THE STATE)	CASE NO. 2016-00059

KY BACKHAUL TRANSMISSION NETWORKS, LLC MOTION TO WITHDRAW

In its Order issue on February 1, 2016 initiating this case, the Commission 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. KY Backhaul Transmission Networks, LLC (the "KY Backhaul"), through undersigned counsel, hereby respectfully requests that the Commission accept this late filed motion to withdraw from this proceeding.¹

In support of this request, KY Backhaul states as follows:

KY Backhaul is not an ETC in Kentucky and does not receive either federal or state USF support. Accordingly, KY Backhaul meets the Commission's threshold for withdrawal from this proceeding.

KY Backhaul has no direct interest in the level of state support provided to ETCs because it does not receive state USF support. Moreover, as shown in response to Commission staff's requests for information, KY Backhaul does provide subscriber lines to the public upon which to assess USF surcharges. KY Backhaul currently reports zero subscriber lines and zero USF surcharges each month. As a result, KY Backhaul is not directly affected by changes to the Kentucky USF assessment and, therefore, has no interest in this proceeding that is not already being addressed by other parties. Accordingly, KY Backhaul seeks to withdraw from further participation in this proceeding.

¹ Concurrently with this Motion, out of an abundance of caution, KY Backhaul is filing responses to the Commission Staff first and second requests for information to all parties.

For the reasons state above, KY Backhaul Transmission Networks, LLC 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 15, 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 15, 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 15, 2016.

Michael P. Donahue

Counsel for KY Backhaul Transmission Networks, LLC