# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of An Inquiry into the State Universal Service fund

Docket No. 2016-00059

# **MOTION FOR PERMISSION TO WITHDRAW**

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NOW COMES Alliance Global Networks, Inc., ("AGN") by and through its attorneys, Crocker & Crocker and files this Motion for Permission to Withdraw, stating as follows:

### BACKGROUND

1. In the Order issued on February 1, 2016 initiating Docket No. 2016-00059, the Commission made every local exchange carrier, commercial mobile radio service provider, and eligible telecommunications service provider ("ETC") a party to this proceeding.

2. This Commission provided any party not an ETC in Kentucky, receiving both federal and state Universal Service Fund ("USF") support, the opportunity to withdraw from the proceeding by filing a written request setting forth the reasons why withdrawal as a party is appropriate.

### FACTS SUPPORTING MOTION FOR PERMISSION TO WITHDRAW

3. AGN is not an ETC in Kentucky, and does not receive support from federal or State Universal Service Fund support mechanisms in Kentucky.

4. AGN receives no State USF support in Kentucky; as such, AGN has no interest in the level of state support provided to ETC's in Kentucky.

5. AGN has no end user customers, and is in no way affected by this change in Kentucky USF assessment.

6. After reviewing the Order, AGN determines that it is not in the interest of AGN to participate at this time.

### **Conclusion**

For the reasons stated above, Crocker & Crocker respectfully requests that the Commission grant Alliance Global Networks, Inc. permission to withdraw from further participation in this proceeding, and issue an Order stating same.

Dated: September 14, 2016

Respectfully Submitted,

Patrick D Crocker Crocker & Crocker 107 W Michigan Ave., 4<sup>th</sup> Floor Kalamazoo MI 49007 (269) 381-8893x226 patrick@crockerlawfirm.com

#### **VERIFICATION**

STATE OF MICHIGAN ) ) ss. COUNTY OF KALAMAZOO )

I, Patrick D Crocker, being duly sworn upon oath, depose and say that I am the Attorney for Alliance Global Networks, Inc., and as such am authorized to make this verification on their behalf; that I have read the foregoing responses; that I know the contents thereof; and that the facts set forth in the foregoing responses are true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.

Patrick D Crocker, Attorney

Subscribed and sworn before me this 14<sup>th</sup> day of September, 2016.

Notary Public

AMANDA GUCICH Notary Public, State of Michigan My Commission expires <u>County of Kalamazoo</u> My Commission Expires 10:02-2018 Acting in the County of <u>VICU</u>