# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

	)	
In the Matter of	)	
An Inquiry into the State Universal	) Docket No. 2016-000	59
Service fund	)	
	)	

#### MOTION FOR PERMISSION TO WITHDRAW

NOW COMES Easton Telecom Services, LLC, ("EASTON") 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. EASTON is not an ETC in Kentucky, and does not receive support from federal or State Universal Service Fund support mechanisms in Kentucky.
- 4. EASTON receives no State USF support in Kentucky; as such, EASTON has no interest in the level of state support provided to ETC's in Kentucky.
- 5. EASTON has no end user customers, and is in no way affected by this change in Kentucky USF assessment.

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

## Conclusion

For the reasons stated above, Crocker & Crocker respectfully requests that the Commission grant Easton Telecom Services, LLC permission to withdraw from further participation in this proceeding, and issue an Order stating same.

Dated: September 16, 2016

Respectfully Submitted,

Patrick D Crocker Crocker & Crocker

107 W Michigan Ave., 4th 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 Easton Telecom Services, LLC, 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 16<sup>th</sup> day of September, 2016.

Notary Public

AMANDA GUCICH
My Commission expirestorary Public, State of Michigan
County of Kalamazoo
My Commission Expires 10-02-2018
Acting in the County of