## BEFORE THE PUBLIC SERVICE COMMISSION COMMONWEALTH OF KENTUCKY

In the Matter of:

Inter Mountain Cable, Inc.,

Complainant,

Case No. 2020-00353

v.

BellSouth Telecommunications, LLC d/b/a AT&T Kentucky,

Defendant.

## INTER MOUNTAIN CABLE, INC.'s UNOPPOSED MOTION TO CONTINUE DEADLINES

Inter Mountain Cable, Inc. ("Inter Mountain Cable"), by counsel, hereby moves the Public Service Commission (the "Commission") to continue all deadlines included in its October 28, 2020 Order. As grounds for its Motion, Inter Mountain Cable states as follows.

Following the filing of Inter Mountain Cable's Complaint on October 23, 2020, the parties continued to conduct discussions to attempt to resolve their dispute necessitating the filing of the Complaint. These discussions resulted in AT&T opening the NXX 606-430 rate center to allow Inter Mountain Cable to serve the Pikeville Medical Center. As of the filing of this Joint Motion, the Pikeville Medical Center is receiving services on the Inter Mountain Cable network. Accordingly, the emergency nature of the relief requested by Inter Mountain Cable's Verified Motion for Emergency Relief has been rendered moot at this time.

Moreover, the Parties' negotiations and discussions regarding this dispute continue, and the Parties' are hopeful that all remaining issues may be resolved without intervention from the Commission. Thus, in the interest of furthering these discussions and fostering cooperation, Inter Mountain Cable respectfully requests that all deadlines within the Commission's October 28, 2020

Order be continued, including the scheduling of the telephonic informal conference on November 2, 2020, and that the parties shall file a status report no later than 45 days from the date of this

Motion. Undersigned counsel has spoken with counsel for AT&T and counsel for AT&T indicated

AT&T had no objection to this Motion.

WHEREFORE, Inter Mountain Cable, Inc. respectfully requests that the Commission order the following:

(1) that the deadlines established in the Commission's October 28, 2020 Order be continued generally; and

(2) that the parties shall file a status report no later than 45 days from the date of this Motion.

This the 30th day of October 30, 2020.

Respectfully submitted,

/s/ R. Brooks Herrick

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## **Certification**

I hereby certify that the electronic version of this filing made with the Commission on October 30, 2020, is a true and accurate copy of the paper document that will be submitted to the Commission within 30 days of the Governor lifting the state of the emergency pursuant to the Commission's Orders in Case No. 2020-00085, and the electronic version of the filing has been transmitted to the Commission. A copy of this filing has been served electronically on all parties of record for whom an email address is given in the online Service List for this proceeding, that there are currently no parties that the Commission has excused from participation by electronic means, and that a copy has also been served upon counsel for AT&T via electronic mail.

/s/ R. Brooks Herrick
Counsel to Inter Mountain Cable Inc.