

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

Investigation of the Proposed Pole Attachment Tariffs )  
of Incumbent Local Exchange Carriers ) Case No. 2022-00108

**Windstream Kentucky East, LLC And Windstream Kentucky West, LLC's**  
**Motion For Extension Of Time To File Compliance Tariff**

Windstream Kentucky East, LLC (“Windstream East”) and Windstream Kentucky West, LLC (“Windstream West”) (collectively, “Windstream”), respectfully request an extension of time through February 14, 2024, to file their respective proposed tariffs setting out the rates and terms approved in the Commission’s December 20, 2023 Order (“Compliance Tariffs”). In support of its Motion, Windstream states as follows:

1. The Commission issued its December 20, 2023 Order approving in part and denying in part Windstream’s proposed pole attachments tariff filed with the Commission pursuant to 807 KAR 5:015. Also within that order, the Commission ordered Windstream to file its Compliance Tariffs within 30 days, or by January 19, 2024.

2. Windstream appreciates the Commission’s thorough review of the proposed tariffs in this matter and its approval, with modifications, of the proposed tariffs. Although Windstream has not yet filed the Compliance Tariffs, Windstream has not ignored the Commission’s order and intends to comply with the Commission’s order. Windstream has experienced unavoidable delays in preparing the Compliance Tariffs as described herein, and respectfully requests a short extension of time to file the Compliance Tariffs with the Commission.

3. As a result of some corporate organizational changes, Windstream has experienced some delays, which includes the delay in preparing and filing the Compliance Tariffs as ordered by the Commission.

4. In addition, Windstream has had to engage a third-party vendor to draft and revise the applicable tariff.

5. Windstream has been working diligently to review the Commission's order, digest its requirements, and to retain a third-party consultant to prepare the Compliance Tariffs as ordered. However, the Compliance Tariffs are not yet completed and Windstream was not able to file them by the January 19, 2024 deadline.

6. Windstream has confirmed with its third-party consultant that the Compliance Tariffs can be finalized and supplied to Windstream by February 14, 2024. Windstream therefore respectfully requests that the Commission to grant it an extension of time through February 14, 2024, to file the Compliance Tariffs with the Commission.

7. The Commission's December 20, 2023 Order does not explicitly prohibits requests for extensions of time to comply with the order. This limited extension is being requested to allow Windstream and its third-party consultant additional needed time to prepare and finalize the Compliance Tariffs and not for purposes of delay. Windstream further submits that granting the requested extension should not cause any party to suffer prejudice.

WHEREFORE, Windstream respectfully requests the Commission to enter an order granting its motion for an extension of time through February 14, 2024 to file its Compliance Tariffs in accordance with the Commission's December 20, 2023 Order.

Respectfully submitted,



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