

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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

**MOTION OF WINDSTREAM KENTUCKY EAST, LLC AND WINDSTREAM
KENTUCKY WEST, LLC FOR EXTENSION OF TIME TO RESPOND TO
SUPPLEMENTAL REQUESTS FOR INFORMATION**

Come Windstream Kentucky East, LLC (“Windstream East”) and Windstream Kentucky West, LLC (“Windstream West”), by counsel, and hereby move the Commission for an extension of time through Friday, June 3, 2022, to file Responses to the Commission Staff’s Second Request for Information to Windstream East, Commission Staff’s Second Request for Information to Windstream West, and the Kentucky Broadband and Cable Association’s (“KBCA”) Supplemental Requests for Information to Windstream East and Windstream West. In support of its Motion, Windstream East and Windstream West state as follows:

1. Pursuant to the Commission’s Order entered on March 30, 2022, supplemental requests for information were to be submitted to the ILECs, including Windstream East and Windstream West, by no later than May 19, 2022. Commission Staff’s Second Requests for Information to Windstream East and Windstream West, and KBCA’s Supplemental Requests for Information to Windstream East and West were filed on March 19, 2022 (collectively referred to as, “Supplemental Requests”).

2. The Commission's Order of March 30, 2022, required the filing of the responses of Windstream East and Windstream West to the Supplemental Requests of Commission Staff and KBCA by no later than June 2, 2022.

3. Windstream East and Windstream West have been working diligently to collect the information responsive to the Supplemental Requests and to prepare and file Windstream East's and Windstream West's Responses to the Supplemental Requests. Unfortunately, due to the illness of in-house counsel, Windstream East and Windstream West are unable to complete the Responses to the Supplemental Requests and file them with the Commission by June 2, 2022.

4. Due to the illness of in-house counsel, Windstream East and Windstream West hereby request the Commission to grant it an extension of time to June 3, 2022, to file the Responses, and a Petition for Confidential Treatment, with the Commission.

5. Ordering Paragraph No. 15 of the Commission's March 30, 2022 Order states, "The Commission does not look favorably upon motions for continuance. Accordingly, motions for extensions of times with respect to the schedule herein shall be made in writing and will be granted only upon a showing of good case."

6. Windstream East and Windstream West submit that the illness of in-house counsel constitutes good cause justifying its motion for an extension of time until June 3, 2022 to file its Responses to the Supplemental Requests. Windstream East and Windstream West further submit that granting the requested one day extension should not cause any party to suffer prejudice.

WHEREFORE, Windstream East and Windstream West respectfully request the Commission to enter an order granting its motion for an extension of time of one day to file its Responses to the Supplemental Requests of Commission Staff and KBCA.

Dated: June 2, 2022

Respectfully submitted,

/s/ Robert C. Moore

Robert C. Moore

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COUNSEL FOR WINDSTREAM

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WINDSTREAM KENTUCKY WEST, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2022, I electronically filed the foregoing document using the Kentucky Public Service Commission's electronic system for filing, which sent notice of filing to counsel of record.

/s/ Robert C. Moore