

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC INVESTIGATION OF THE PROPOSED
POLE ATTACHMENT TARIFFS OF INCUMBENT
LOCAL EXCHANGE CARRIERS

CASE NO. 2022-108

**MOTION OF WINDSTREAM KENTUCKY EAST, LLC, AND WINDSTREAM
KENTUCKY WEST, LLC, TO FILE RESPONSES TO KENTUCKY BROADBAND AND
CABLE ASSOCIATION'S OBJECTIONS AND NOTICE OF APPEARANCE OF
COUNSEL AND STATEMENT REGARDING ELECTRONIC FILING PROCEDURES
ON OR BEFORE APRIL 20, 2022**

Come Windstream Kentucky East, LLC ("Windstream Kentucky East"), and Windstream Kentucky West, LLC ("Windstream Kentucky West"), by counsel, and for their Motion to File Responses to Kentucky Broadband and Cable Association's ("KBCA") Objections and Notice of Appearance of Counsel and Statement Regarding Electronic Filing Procedures on or Before April 20, 2022, state as follows:

1. Due to inadvertent administrative oversight, Windstream Kentucky East and Windstream Kentucky West failed to file their Notice of Appearance of Counsel and Statement Regarding Electronic Filing Procedures on or before April 7, 2022, and their Responses to KBCA's Objections on or before April 14, 2022, as required by the Public Service Commission's Order of March 30, 2022.
2. Windstream Kentucky East and Windstream Kentucky West request leave to file their Notice of Appearance of Counsel and Statement Regarding Electronic Filing Procedures and Responses to KBCA's Objections on or before April 20, 2022, which would allow KBCA and other intervenors to review the Notice and the Responses before filing their initial requests for information.

3. The filing of the Responses of Windstream Kentucky East and Windstream Kentucky West to KBCA's Objections on or before April 20, 2022, would enable them to maintain consistency with the Commission schedule set forth in this case.

4. Granting the Motion of Windstream Kentucky East and Windstream Kentucky West to file their Notice of Appearance of Counsel and Statement Regarding Electronic Filing Procedures and Responses to KBCA's Objections on or before April 20, 2022, should not result in prejudice to any of the parties in this action, and should facilitate the efficient administration of this case.

Dated: April 18, 2022

Respectfully submitted,

/s/ Robert C. Moore

Robert C. Moore

Katie M. Glass

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COUNSEL FOR THE WINDSTREAM
KENTUCKY EAST, LLC, AND WINDSTREAM
KENTUCKY WEST, LLC

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing filing was electronically transmitted to the Commission and counsel of record on April 18, 2022, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Robert C. Moore

Robert C. Moore