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March 18, 2010

Jeff DeRouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40601

RECEIVED
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PUBLIC SERVICE
COMMISSION

*RE: MCI Communications, Inc. et al v. Windstream Kentucky East, LLC et al
Case No. 2007-00503*

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of Verizon's Motion for Extension of Time.

Please indicate receipt of this filing by placing your file stamp on the extra copy and returning to me via the enclosed self-addressed postage paid envelope.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent
Douglas F. Brent

DFB:

Enclosures

cc: Service List

571328.1

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

MCImetro Transmission Access Services LLC,)
MCI Communications Services, Inc.,)
Bell Atlantic Communications, Inc.,)
NYNEX Long Distance Company,)
TTI National, Inc.,)
Teleconnect Long Distance Service & Systems)
and Verizon Select Services, Inc.)

Complainants)

vs.)

Windstream Kentucky West, Inc.,)
Windstream Kentucky East, Inc. – Lexington,)
and Windstream Kentucky East, Inc. – London)

Defendants)

Case No. 2007-00503

MOTION FOR EXTENSION OF TIME

MCImetro Transmission Access Transmission Services LLC, d/b/a Verizon Access Transmission Services, MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc., Teleconnect Long Distance Service & Systems d/b/a Telecom*USA and Verizon Select Services, Inc. (collectively, “Verizon”) through undersigned counsel, move the Kentucky Public Service Commission (the “Commission”) for an extension of time to submit additional requests for information to Windstream Kentucky East LLC and Windstream Kentucky West LLC (“Windstream”) until ten business days after Windstream provides its confidential responses to the initial data requests

served by Verizon on March 30, 2009. Verizon also proposes that Windstream be required to respond to Verizon's additional data requests two weeks after they are served, but in no event later than April 16, 2010.

As grounds for this motion, Verizon states that Windstream's delay in providing complete responses to Verizon's prior data requests has prevented Verizon from identifying the areas in which additional discovery is necessary. Windstream thus far has provided only the "public" versions of its responses to Verizon's initial data requests. Due to the redaction of information that Windstream claims is confidential, those "public" responses contain very little by way of substantive responses to the data requests. Windstream insisted that it could not provide more complete answers unless and until Verizon entered into a nondisclosure agreement with Windstream covering the exchange of such allegedly confidential material. However, Verizon and Windstream *already entered into such an agreement more than two years ago* that specifically covered the disclosure and handling of confidential information pursuant to discovery in this proceeding.

Accordingly, after receiving the "public" version of Windstream's responses on March 8, 2010, along with Windstream's proposed "Information Exchange and Non-Disclosure Agreement," counsel for Verizon reminded counsel for Windstream that Verizon has already disclosed confidential information to Windstream pursuant to a Confidentiality Agreement executed with Windstream in December 2007, shortly after Verizon filed its Complaint. Windstream and Verizon have had further discussions, but Windstream has not yet provided the complete responses. Without the complete, non-public version of Windstream's responses, Verizon obviously cannot evaluate what areas require further discovery and cannot prepare additional requests for information. Verizon therefore seeks additional time in which to prepare

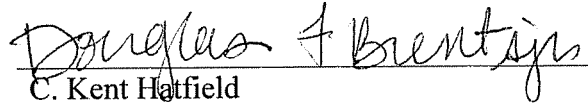
and serve any additional data requests, during which time it hopes to resolve this confidentiality issue with Windstream and receive Windstream's complete responses to the prior data requests.

The extension of time requested in this motion will not unduly delay the proceeding or otherwise impair the Commission's ability to conduct its investigation. Assuming Windstream furnishes the confidential information without further delay, no other schedule changes are required. Pre-filed direct testimony is due May 14, 2010. Verizon will meet that deadline as long as Windstream is required to respond promptly and completely to pending and future information requests.

WHEREFORE, Verizon requests the Commission enter an order granting an extension of time to submit requests for information to Windstream through and until ten days from the date Windstream serves its confidential responses to Verizon's outstanding requests for information. Verizon also requests that Windstream be required to serve its additional responses within two weeks after Verizon serves its information requests, but no later than April 16, 2010.

Dated: March 18, 2010

Respectfully submitted,



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& Systems and Verizon Select Services,
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion was served via U.S. mail, first-class, postage prepaid, this 18th day of March, 2010, upon the following persons:

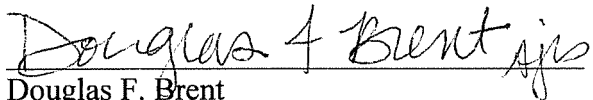
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