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November 13, 2009

Via Hand-Delivery

Mr. Jeff R. Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

NOV 13 2009

**PUBLIC SERVICE
COMMISSION**

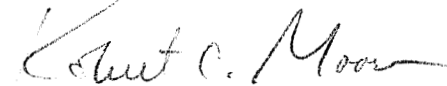
Re: Petition of Windstream Kentucky East, LLC ("Windstream") for Arbitration of an Interconnection Agreement with New Cingular Wireless PCS, LLC, D/B/A AT&T Mobility
Case No. 2009-00246

Dear Mr. Derouen:

Please find enclosed for filing in the above referenced case the original and 10 copies of Windstream's Motion to Suspend Procedural Schedule and Request for Expedited Treatment.

Please call me if you have any questions concerning this filing, and thank you for your attention to this matter.

Respectfully submitted,



Robert C. Moore

RCM/neb
Enclosure
cc: Stacy Majors

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
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PUBLIC SERVICE
COMMISSION

In the Matter of:

PETITION OF WINDSTREAM KENTUCKY)	
EAST, LLC, FOR ARBITRATION OF AN)	CASE NO.
INTERCONNECTION AGREEMENT WITH)	2009-00246
NEW CINGULAR WIRELESS PCS,)	
D/B/A AT&T MOBILITY)	

Windstream's Motion to Suspend Procedural Schedule and Request for Expedited Treatment

Comes Windstream Kentucky East, LLC ("Windstream") hereby files its Motion to Suspend Procedural Schedule and Request for Expedited Treatment for the reasons set forth below.

Pursuant to the Procedural Schedule set by the Commission in this matter, the parties have served First Data Requests and Second Data Requests. The parties are currently discussing and attempting to resolve discovery issues arising in connection with the answers to the First and Second Data Requests without either Party having to file a motion to compel discovery from the other Party.

The current Procedural Schedule requires the Parties to prepare and file a joint matrix of issues on November 18, 2009, and prepare and file direct testimony on November 24, 2009. It will be difficult for the parties to prepare a comprehensive joint matrix of issues and the direct testimony addressing these issues prior to the resolution of the discovery issues. Therefore, Windstream requests that the Procedural Study be suspended while the parties attempt to

resolve these discovery issues between themselves before involving the Commission by filing a motion to compel. Such suspension would not affect the Commission's ruling on the AT&T's Motion for Partial Dismissal, as that motion is ready for decision, is unaffected by any discovery disputes, and the resolution of same may assist the Parties in narrowing the issues. However, all other dates would be suspended.

On Tuesday, November 10, 2009, Windstream's counsel was contacted by Counsel for New Cingular Wireless PCS, D/B/A AT&T Mobility and requested to enter into a Joint Motion to Suspend the Discovery Schedule and for Expedited Treatment drafted by AT&T's counsel. As set forth above, Windstream agrees in principle with the request to suspend the procedural schedule, but the parties could not agree on the specific language of the proposed joint motion.

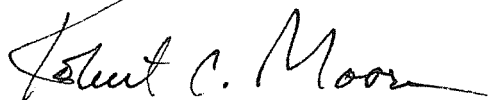
Windstream therefore requests the Commission to enter an order suspending the current Procedural Schedule, with the exception of the current November 16, 2009, deadline for the Commission to rule on AT&T Mobility's Motion for Partial Dismissal, to allow the Parties the time and opportunity to resolve the discovery disputes. If the Parties are unable to resolve the disputes by December 10, 2009, then Windstream proposes that the Commission require the Parties to file motions to compel, if any, by December 18, 2009. Windstream requests that the Commission rule on any motions to compel within 30 days of their being filed. After the Commission rules on such motions, Windstream proposes that the Commission require the Parties to file a proposed amended

Procedural Schedule within 10 business days of the Commission's ruling. If the Parties resolve their differences and do not file motions to compel by December 18, 2009, Windstream proposes that the Commission require the Parties to file a proposed amended Procedural Schedule by January 8, 2010.

Because of the short time-frames involved, Windstream respectfully requests that this motion be given expedited treatment.

WHEREFORE, Windstream respectfully requests that its Motion to Suspend Procedural Schedule and Request for Expedited Treatment be granted, and that the current Procedural Schedule in the above captioned matter be suspended until such time as an amended Procedural Schedule is approved by this Commission.

Respectfully submitted,



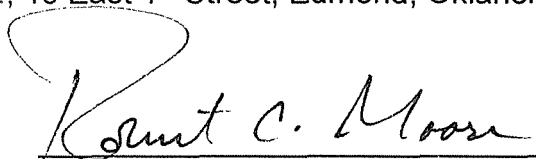
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and Stacy Majors,
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Windstream Communications, Inc.
Rodney Parham Road
Little Rock, Arkansas 72212-2442

COUNSEL FOR WINDSTREAM
KENTUCKY EAST, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent via hand delivery on this the 13th day of November, 2009 on Jeff R. Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615 and Tiffany Bowman, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615, and by first class mail, postage pre-paid on Mary K. Keyer, General Counsel/AT&T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky 40203, and Paul Walters, Jr., 15 East 1st Street, Edmond, Oklahoma 73034.



Robert C. Moore