

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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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)	

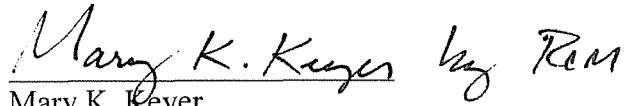
**JOINT MOTION FOR EXTENSION OF TIME
TO FILE MOTIONS TO COMPEL**

Windstream Kentucky East, LLC (“Windstream”) and New Cingular Wireless PCS, LLC d/b/a AT&T Mobility and its operating affiliates (collectively, “AT&T Mobility”), hereby file their Joint Motion for Extension of Time to File Motions to Compel in this case. The parties request an extension of time through January 11, 2010. In support of their Joint Motion, the parties state as follows.

The Commission’s Order dated November 24, 2009, provides that if the parties are unable to resolve their disputes by December 10, 2009, the parties shall file motions to compel, if any, by December 18, 2009. The parties continue to work to resolve the discovery issues and request the extra time to address the remaining matters. The additional time will account for the holidays and will allow the parties to focus on the issues and attempt to resolve the issues without the need for filing motions to compel. Should the parties not reach a resolution on the issues, however, the parties propose January 11, 2010, as the date by which they must file motions to compel pursuant to the Commission’s November 24, 2009, Order.

Based on the foregoing, Windstream and AT&T Mobility respectfully request that their Joint Motion for Extension of Time to File Motions to Compel be granted.

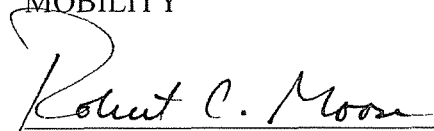
Respectfully submitted,

 Mary K. Keyer by Rem

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COUNSEL FOR NEW CINGULAR
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MOBILITY

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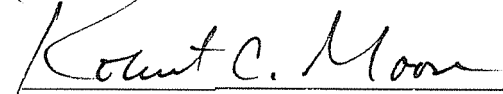
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COUNSEL FOR WINDSTREAM
KENTUCKY EAST, LLC

CERTIFICATE OF SERVICE

On this 18th day of December, 2009, a true and correct copy of the foregoing was transmitted via United States certified mail, postage prepaid, return receipt requested to Mary K. Keyer, General Counsel, AT&T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky 40203, Paul Walters, Jr., 15E First Street, Edmond, Oklahoma 73034 and Stacy Majors, Regulatory Counsel, Windstream Communications, Inc., Rodney Parham Road, Little Rock, AK 72212-2442.


Robert C. Moore