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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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

WINDSTREAM KENTUCKY EAST, LLC'S
MOTION TO TAKE DEPOSITIONS

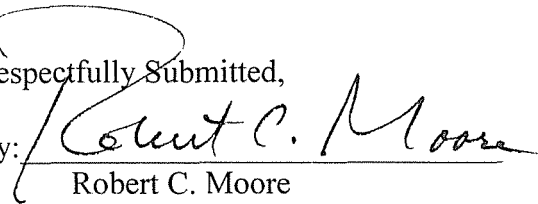
Comes Windstream Kentucky East, LLC (“Windstream”), by counsel, and hereby submits its Motion To Take Depositions in the above-styled proceeding.

Windstream believes the normal procedure providing for the pre-filing of testimony, additional discovery concerning same and then cross examination of witnesses at the hearing will result in a fair hearing in this proceeding. However, New Cingular Wireless PCS d/b/a AT&T Mobility (“AT&T Mobility”) has filed a Motion To Take Depositions alleging that allowing it to take depositions in this matter will result in a more efficient and effective hearing process. Accordingly, in the event that the Public Service Commission grants AT&T Mobility’s Motion To Take Depositions, Windstream requests the entry of an Order allowing it to take the deposition of the witnesses that will file written testimony in support of AT&T Mobility’s position in this proceeding, including but not limited to its position with respect to Originating MTA, and individuals who, if not a testifying witness, can answer in-depth questions regarding the current discovery responses produced by AT&T Mobility in this case.

Windstream states that granting only one party the right to take the deposition of witnesses would not result in the more efficient hearing described by AT&T Mobility. Furthermore, it would be improper to allow AT&T Mobility to take the deposition of Windstream's witnesses without allowing Windstream to take the deposition of the identified AT&T Mobility witnesses and/or employees.

Respectfully Submitted,

By:


Robert C. Moore
Hazelrigg & Cox, LLP
P.O. Box 676
415 West Main Street
Frankfort, Kentucky 40602-0676

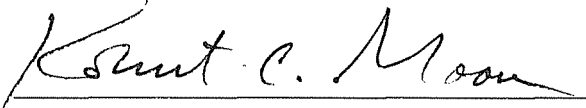
Stacy Majors
Regulatory Counsel
Windstream Communications, Inc.
4001 Rodney Parham Road
Little Rock, Arkansas 72212
501-748-6873

CERTIFICATE OF SERVICE

On this 5th day of March, 2010, true and correct copies of the foregoing Notice of Filing were 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, KY 40203

Paul Walters, Jr.
15E. First Street
Edmond, Oklahoma 73034


Robert C. Moore