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August 26, 2019

RECEIVED

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PUBLIC SERVICE  
COMMISSION

**VIA HAND DELIVERY**

Gwen R. Pinson  
Executive Director  
Public Service Commission  
211 Sower Blvd  
Frankfort, Kentucky 40601

**Re: Request for Approval of Interconnection Agreement Between Bellsouth  
Telecommunications, Inc. and CSC Wireless, LLC, PSC Reference No. 01214**

Dear Sir or Madam:

Pursuant to Section 252(e)(1) of the Telecommunications Act of 1996 (the "**Act**"), 47 U.S.C. § 252 (e)(1), CSC Wireless, LLC d/b/a Altice Wireless ("**Altice Wireless**"), through its undersigned counsel, hereby requests expedited approval of a negotiated interconnection agreement between BellSouth Telecommunications, Inc. ("**BellSouth**" or "**AT&T-KY**") and Altice Wireless.

Altice Wireless is a utility within the meaning of KRS 278.010(3)(e) and is authorized to provide service in Kentucky. AT&T-KY is an incumbent local exchange carrier or ILEC.

Altice Wireless and BellSouth have entered into an interconnection agreement that will apply to Kentucky and various other states where Altice Wireless will provide service. Counsel for AT&T-KY filed the referenced agreement with the Commission on June 25, 2019. By its terms, the Effective Date of this Agreement shall be the earlier of ten (10) days after either the day (i) the Commission approves this Agreement under Section 252(e) of the Act, or (ii) this Agreement is deemed approved under Section 252(e)(4) of the Act.<sup>1</sup> The Commission acknowledged receipt of the agreement by your letter dated July 24, 2019, and posted the agreement on the Commission's publicly accessible website.<sup>2</sup>

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<sup>1</sup> Agreement at § 8.1.1.

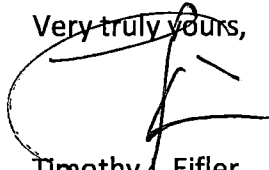
<sup>2</sup> [https://psc.ky.gov/PSCICA/0000/01214/01214-AI\\_062519.pdf](https://psc.ky.gov/PSCICA/0000/01214/01214-AI_062519.pdf).

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Upon inquiring about the status of the agreement, Altice Wireless learned that although staff has reviewed and tacitly approved the agreement, there has been no Commission order approving the agreement within the meaning of Section 252(e)(1) of the Act. Absent affirmative Commission action the agreement arguably becomes effective only by operation of federal law, after the 90 day period described in Section 252(e)(4) of the Act.<sup>3</sup> However, Altice Wireless intends to operate using the agreement as soon as possible, and AT&T-KY is ready to perform. Accordingly, Altice Wireless requests that the Commission issue an order approving the negotiated agreement. Such order will expedite Altice Wireless's entry into the Kentucky market.

If there are questions concerning this request please contact Dennis Moffit at Altice, 469-305-5261, or contact me at the number above.

Very truly yours,



Timothy J. Eifler

TJE:dgo

cc: Richard T. Howell  
AT&T Kentucky  
208 S Akard Street  
Dallas, TX 75202

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<sup>3</sup> The July 24, 2019 letter states that the agreement is in compliance with federal and state law but that it is "unnecessary for Staff to refer this matter for formal Commission action....[since] pursuant to 47 U.S.C. 252 [it] shall be effective on September 23, 2019."