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FILE

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March 14, 2008

VIA HAND DELIVERY

Ms. Renee Jenkins
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street, 13th Floor
Columbus, OH 43215-3793

Re:

In the Matter of Windstream Western Reserve, Inc.'s Application For Out-of-Service Grace Period Under Minimum Telephone Service Standards., Case No. 08-158-TP-WVR

Dear Ms. Jenkins:

Enclosed herewith are the original and eight (8) copies of the *Application* to be filed in the above-noted matter. Please time-stamp the two (2) additional copies of this document and return them with our courier.

Thank you for your attention to this matter.

Very truly yours,

BAKEY CAVALIERI LLC

William A. Adams

WAA/ncv

Enclosure

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

Technician Date Processed 3/17/2008

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of Windstream Western Reserve,) Case No. 08-256-TP-WVR Inc.'s Application For Out-of-Service Grace Period) Under Minimum Telephone Service Standards)

APPLICATION

Pursuant to Rule 4901:1-5-08(D), Ohio Administrative Code, Windstream Western Reserve, Inc. ("Windstream") files this application seeking an additional forty-eight hour grace period to clear out-of-service trouble reports as a result of the recent severe ice and snow storms in Ashtabula and Lake Counties. This would apply to all trouble reports filed on March 4 through 9, 2008 for the exchanges listed below. As set forth in this pleading, the specific requirements of Rule 4901:1-5-08(D) are satisfied, including that this application has been filed within ten business days of the weather-related incident. Rule 4901:1-5-08(D)(1). Supplemental information sufficient to justify this request will be filed within thirty days as permitted by Rule 4901:1-5-08(D)(3).

As a result of the ice and snow storms, the Ashtabula and Lake County officials declared a state of emergency, satisfying the requirement of Rule 4901:1-5-08(D)(1)(b) which provides, "Any declaration of a state of emergency by the governor or a duly authorized county official for the county in which the exchange is located." Windstream's Geneva, Austinburg, Trumbull, Ashtabula, Trumbull, Rock Creek, Kingsville, Pierpont, Dorset, Madison, and Perry Exchanges fall within these counties and are the subject of this Application.

In addition, as an alternative basis for relief, some of the same exchanges may have experienced more than a three hundred percent increase in the number of out-of-service reports #550173v3

as compared to the average number during March of the three previous years. This satisfies Rule 4901:1-5-08(D)(1)(a), which requires, "At least a three hundred per cent increase in the number of out-of-service reports as compared to the average number of out-of-service reports for the affected month(s) of the three previous years."

It is expected that all of the exchanges listed in this application had more than ten daily out-of-service reports during the requested grace period, satisfying Rule 4901:1-5-08(D)(2).

Wherefore, Windstream requests that it have the additional forty-eight hour grace period to clear out-of-service trouble reports for these exchanges for trouble reports made on March 4 through March 9, 2008. Any out-of-service trouble reports not cleared by the end of the grace period would be subject to the appropriate customer adjustment set forth in Rule 4901:1-5-08(C).

Respectfully submitted

William A. Adams
Counsel of Record

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