

Commonwealth of Kentucky
Before the Public Service Commission

In the Matter of:

COMMUNICATION WORKERS OF AMERICA
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS
AND
WINDSTREAM

Re: ENFORCEMENT OF COMMISSION ORDER
IN CASE NO. 2005-00534 WITH REGARD TO
COMPLIANCE OF CONDITIONS

RECEIVED

FEB 13 2007

PUBLIC SERVICE
COMMISSION

Case No. 2007-00069

ATTORNEY GENERAL'S MOTION IN SUPPORT OF COMMUNICATION WORKERS
OF AMERICA AND INTERNATIONAL BROTHERHOOD OF ELECTRICAL
WORKERS PETITION FOR ENFORCEMENT OF ORDER IN CASE NO. 2005-00534

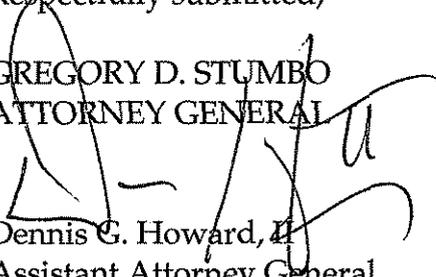
Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, pursuant to KRS 367.150(8), and files this motion in support of the Communication Workers of America and the International Brotherhood of Electrical Workers petition to the Public Service Commission for enforcement of its 23 May 2006 order in case number 2005-00534.

As grounds for his motion in support of the petition, the Attorney General adopts and incorporates the petitioners' petition as though stated herein. Moreover, the Attorney General requests the Commission to exercise its authority under KRS 278.390 and compel Windstream to comply with the conditions specified in the conditional approval in case number 2005-00534; or, in the alternative, the Attorney General moves the Commission to revoke or otherwise render void the Commission's approval of the

transfer of control in case number 2005-00534 and further grant him any other relief available to him under the Commission's jurisdiction and authority.

Respectfully submitted,

GREGORY D. STUMBO
ATTORNEY GENERAL



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Assistant Attorney General
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Frankfort, KY 40601-8204
502 696-5453

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of this Motion in Support of Communications Workers of America and International Brotherhood of Electrical Workers Petition for Enforcement of Order in Case No. 2005-00534 were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served by mailing a true and correct of the same, first class postage prepaid, to

Jeffrey Gardner, CEO
Windstream
4001 Rodney Parham Road
Little Rock, Arkansas 72212

Hon. Mark Overstreet
Stites & Harbison
P.O. Box 634
Frankfort, Kentucky 40602-0634

Hon. Don Meade
800 Republic Building
429 W. Muhammad Ali Blvd.
Louisville, Kentucky 40202

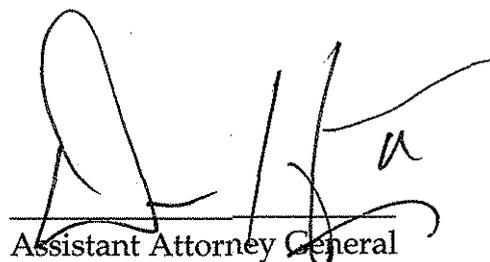
Hon. Bethany L. Bowersock
P. O. Box 1001
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Hon. David J. Barberie
Corporate Counsel
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
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all on this 13th day of February, 2007.



Assistant Attorney General