

**BEFORE THE KENTUCKY
PUBLIC SERVICE COMMISSION**

BellSouth Telecommunications, Inc. Petition)
for Declaratory Order Regarding Interconnection)
with Central Kentucky Network for)
911/E911 Service to Public Safety Answering)
Points)

No. 2015-00227

**AT&T KENTUCKY’S RESPONSE TO
GARRARD COUNTY, KENTUCKY’S
MOTION TO INTERVENE**

Comes AT&T Kentucky,¹ by counsel, and for its Response to Garrard County, Kentucky’s (“Garrard County”) Motion to Intervene, states as follows.

1. By its Order of July 31, 2015, the Public Service Commission (“Commission”) ordered that motions to intervene “shall be filed no later than August 26, 2015.” By its Order of August 26, 2015, the Public Service Commission ordered that Responses to AT&T Kentucky’s Petition for Declaratory Order “shall be filed no later than September 11, 2015”, and Replies to Responses “shall be filed no later than September 25, 2015.”

2. Garrard County’s Motion to Intervene was filed with the Commission on September 11, 2015 (after the August 26 deadline established by the Commission), and a Response was not tendered with the Motion to Intervene.

3. Should the Commission grant Garrard County’s late-filed Motion to Intervene, AT&T Kentucky respectfully requests the Commission to require Garrard County to file any Response it may have to the Petition for Declaratory Order on or before Friday, September 18, 2015, in order to maintain the current procedural schedule. In the alternative, if Garrard County is given an extension of time beyond September 18, 2015, to file its Response, AT&T Kentucky

¹ BellSouth Telecommunications, LLC., d/b/a AT&T Kentucky

requests the Commission to grant it a corresponding extension of time to file its Reply to all Responses in this proceeding.

Respectfully submitted,

/s/ Robert C. Moore
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FILING NOTICE AND CERTIFICATE

I hereby certify that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission (which includes a cover letter serving as the required Read 1st document) within two business days; that the electronic filing was transmitted to the Commission on September 16, 2015; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Robert C. Moore

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by placing same in the U.S. Mail, postage pre-paid, this the 16th day of September, 2015, on the following:

John Wilson
Garrard County Judge Executive
15 Public Square
Lancaster, KY 40444



Robert C. Moore