

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

APPLICATION OF BELL SOUTH)	
TELECOMMUNICATIONS, LLC FOR)	CASE NO..
DECLARATORY ORDER REGARDING)	2015-00227
INTERCONNECTION WITH CENTRAL)	
KENTUCKY NETWORK FOR 911/E911)	
SERVICES TO PUBLIC SAFETY)	
ANSWERING POINTS)	

**JESSAMINE COUNTY FISCAL COURT'S
RESPONSE TO VERIFIED PETITION FOR DECLARATORY ORDER**

Comes Jessamine County Fiscal Court, Jessamine County, Kentucky ("JCFC"), by counsel, and pursuant to 807 KAR 5:001 Section 3(8), and files the following as its response to BellSouth Telecommunications, Inc.'s, d/b/a AT&T Kentucky ("AT&T Kentucky"), Verified Petition for Declaratory Order. To the extent appropriate and necessary this response shall also serve as a supplemental response of the Central Kentucky 9-1-1 Network (the "Network").

JCFC respectfully requests that this matter be dismissed as the Public Service Commission lacks jurisdiction over the Network. Alternatively, JCFC requests that the relief requested in this matter be denied in its entirety. Finally, in the event that the Public Service Commission finds that the Network is a

regulated utility, JCFC reserves the right to join in a request for further relief pursuant to KRS 278.512(2).

Respectfully Submitted,

By 

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FILING NOTICE AND CERTIFICATE

I hereby certify that an original and ten (10) copies of this Response were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery postage prepaid, on 9th day of September, 2015:

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