

JONATHON N. AMLUNG
ATTORNEY AT LAW
1000 REPUBLIC BUILDING
429 W. MUHAMMAD ALI BLVD.
LOUISVILLE, KENTUCKY 40202-2347

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TELEPHONE: (502) 587-6838
FACSIMILE: (502) 584-0439
E-MAIL: jonathon@amlung.com

October 19, 2004

Ms. Beth A. O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

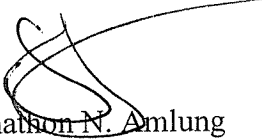
RE: Vanover, Hall & Bartley, P.S.C., vs. BellSouth Telecommunications, Inc.
Case No. 2004-00410

Dear Ms. O'Donnell:

Please find enclosed for filing an original and ten (10) copies of SouthEast Telephone's Motion to Intervene, for filing in the above-referenced case.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions or concerns.

Cordially yours,


Jonathon N. Amlung

Enclosures

cc: Parties of Record

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

VANOVER, HALL & BARTLEY, P.S.C.)
)
 Complainant)
)
 vs.) CASE NO.
) 2004-00410
)
 BELLSOUTH TELECOMMUNICATIONS, INC.)
)
 Respondent)

MOTION FOR LEAVE TO INTERVENE

Comes now SouthEast Telephone, Inc. ("SouthEast"), by and through counsel, and hereby Petitions this Honorable Commission pursuant to 807 KAR 5:001, Section 3, for an Order permitting it to Intervene as a party in this case. In support of this Petition, SouthEast states as follows:

1. On October 8, 2004, Vanover, Hall & Bartley, P.S.C., ("the Vanover firm") filed a formal complaint against BellSouth Telecommunications, Inc. ("BellSouth").
2. The complaint alleges, *inter alia*, that BellSouth terminated the Complainant's digital subscriber line ("DSL") service without justification or notice.
3. The Vanover firm is a current customer of Movant, SouthEast Telephone, Inc. ("SouthEast").
4. Upon information and believe, SouthEast alleges that BellSouth terminated Complainant's DSL service because BellSouth has adopted an unjust policy of refusing to provide its DSL product to customers of competitive local exchange carriers ("CLECs") such as SouthEast.

5. BellSouth is refusing to provide its DSL product to any CLEC customer, whether the customer's line is provided through UNE-P or through a resale agreement with BellSouth.

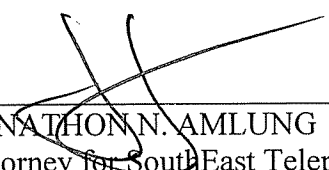
6. SouthEast has information that would be beneficial to the Commission in the resolution of this Complaint.

7. SouthEast requests that it be granted leave for full intervention with the right to fully participate in this proceeding as a party, and that the undersigned counsel for SouthEast be served with filed testimony, exhibits, pleadings, correspondence and all other documents submitted by parties and be certified as a party for the purposes of receiving service of any petition for rehearing or judicial review.

8. SouthEast agrees for purposes of this Motion to be bound by any procedural schedule, Order or any other mandate of the Commission in reaching a resolution to this matter.

WHEREFORE, in recognition of the foregoing, SouthEast respectfully requests that the Commission permit SouthEast to intervene fully as a party of record in this proceeding.

Respectfully submitted,



JONATHON N. AMLUNG
Attorney for SouthEast Telephone, Inc.
P.O. Box 1417
Louisville, Kentucky 40201-1417
Telephone: (502) 568-5686
Facsimile: (502) 584-0439

CERTIFICATION

I hereby certify that a true and correct copy of the foregoing was mailed, this the

19th day of October, 2004, to:

Ms. Joan Coleman
BellSouth Telecommunications, Inc.
601 W. Chestnut Street, Room 410
Louisville, KY 40203

Mr. Gregory Hall
Vanover, Hall & Bartley, P.S.C.
P.O. Box 576
Pikeville, KY 41502



JONATHON N. AMLUNG

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ATTORNEY AT LAW
P.O. BOX 1417
LOUISVILLE, KENTUCKY 40201-1417

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