



STOLL · KEENON · OGDEN
P L L C

2000 PNC PLAZA
500 WEST JEFFERSON STREET
LOUISVILLE, KENTUCKY 40202-2828
502-333-6000
FAX: 502-333-6099
WWW.SKOFIRM.COM

DOUGLAS F. BRENT
DIRECT DIAL 502-568-5734
DIRECT FAX 502-562-0934
doug.brent@skofirm.com

January 16, 2007

RECEIVED

JAN 16 2007

PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

**RE: Investigation Into the Emergency Procedures Used by Windstream Kentucky
East in Response to the September 23, 2006 Outage**
KPSC Case No. 2006-00532

Dear Ms. O'Donnell:

Enclosed please find and accept for filing the original and ten copies of T-Mobile USA, Inc., Powertel/Memphis, Inc. and T-Mobile Central LLC's Motion for Full Intervention in the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions or need any additional information, please contact me at your convenience.

Very truly yours,

Douglas F. Brent

DFB/ec
Enclosures
cc: Daniel Logsdon

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JAN 16 2007

PUBLIC SERVICE
COMMISSION

In the Matter of:

INVESTIGATION INTO THE EMERGENCY PROCEDURES)
USED BY WINDSTREAM KENTUCKY EAST IN)
RESPONSE TO THE SEPTEMBER 23, 2006 OUTAGE) CASE NO.
) 2006-00532
)
)

MOTION FOR FULL INTERVENTION

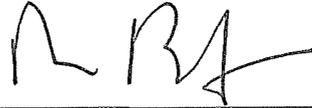
Pursuant to 807 KAR 5:001, Section 3(8), T-Mobile USA, Inc., Powertel/Memphis, Inc. and T-Mobile Central LLC (hereinafter collectively "T-Mobile") submits this motion for full intervention in the above-captioned proceeding.

T-Mobile is a commercial mobile service provider as defined under United States Code, Title 47, Section 332(d). T-Mobile provides wireless voice and data services to customers in the Commonwealth of Kentucky pursuant to licenses issued by the Federal Communications Commission ("FCC"). T-Mobile interconnects with Windstream Kentucky East ("Windstream") pursuant to a commercially negotiated interconnection agreement approved by this Commission and also purchases additional services via certain Windstream intrastate tariffs.

The September 23, 2006 outage in Windstream's Elizabethtown central office directly affected T-Mobile insofar as its customers were not able to originate or receive calls which would have transited the Windstream facilities that were out of service. Participation by T-Mobile is likely to present issues that will assist the Commission without unduly complicating the proceedings. T-Mobile has a special interest in the proceeding not otherwise represented by any party. Filings, notices and other papers may be served on undersigned counsel for T-Mobile.

Thus, T-Mobile's interests in this proceeding satisfies the requirements of the Commission's regulation for full intervention. 807 KAR 5:001 Section 3(8)(b).

For the reasons stated above, T-Mobile asks that this Motion for Full Intervention be granted.

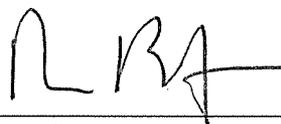


Kendrick R. Riggs
Douglas F. Brent
STOLL KEENON OGDEN PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion for Full Intervention has been served by U.S. mail on those persons whose names appear below this 16th day of January, 2007.

Daniel Logsdon
Windstream Kentucky East
130 West New Circle Road
Suite 170
Lexington, KY 40505

A handwritten signature in black ink, appearing to read 'D. Brent', written over a horizontal line.

Douglas F. Brent