

# S T O L L · K E E N O N · O G D E N

2000 PNC Plaza 500 West Jefferson Louisville, KY 40202 (502) 333-6000 Fax: (502) 333-6099 www.skofirm.com

Douglas F. Brent (502) 568-5734 douglas.brent@skofirm.com

November 1, 2007

RECEIVED

NOV 01 2007

PUBLIC SERVICE COMMISSION

Ms. Elizabeth O'Donnell Executive Director Kentucky Public Service Commission P.O. Box 615 Frankfort, KY 40602

RE: Case No. 2007-00162

Dear Ms. O'Donnell:

Enclosed please find an original and ten copies of a Motion for Intervention in the above referenced case. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

**Enclosures** 

RECEIVED

# COMMONWEALTH OF KENTUCKY PUBLIC SERVICE BEFORE THE PUBLIC SERVICE COMMISSION: OMNO 0 1 2007 PUBLIC SERVICE

#### In the Matter of:

APPLICATION OF NORTH CENTRAL TELEPHONE	)	
COOPERATIVE CORPORATION TO ADJUST RATES	)	CASE NO.
AND CHARGES FOR BASIC LOCAL EXCHANGE	)	2007-00162
SERVICE EFFECTIVE NOVEMBER 12, 2007	)	

### **MOTION FOR FULL INTERVENTION**

Pursuant to 807 KAR 5:001, Section 3(8), McImetro Transmission Access Transmission Services LLC, d/b/a Verizon Access Transmission Services, MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc., Teleconnect Long Distance Service & Systems d/b/a Telecom\*USA and Verizon Select Services, Inc. (collectively, "Verizon") submit this motion for full intervention in the above-captioned proceeding.

Verizon provides interexchange service in Kentucky and purchases tariffed access services from North Central Telephone Cooperative Corporation, the applicant in this proceeding. As a ratepayer of the applicant, Verizon has a direct interest in any examination of rate levels which may occur in this proceeding. Moreover, Verizon's interests could be affected by the applicant's requests that the Commission waive certain filing requirements related to jurisdictional summaries of financial data. *See* Application, par. 34.

Participation by Verizon is likely to present issues that will assist the Commission without unduly complicating the proceedings. Verizon 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 Verizon. Thus, Verizon's interests in this proceeding satisfy the requirements of the Commission's regulation for full intervention. 807 KAR 5:001 Section 3(8)(b).

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

Ouglas F. Buryos C. Kent Hatfield

Douglas F. Brent

STOLL KEENON OGDEN PLLC

2000 PNC Plaza

500 West Jefferson Street

Louisville, Kentucky 40202-2828

Telephone: (502) 333-6000

Dulaney L. O'Roark, III Vice President and General Counsel – Southeast Region Verizon P. O. Box 110, MC FLTC0007 Tampa, Florida 33601

Counsel for MCImetro Transmission Access Transmission Services LLC, MCI Communications Services, Inc., Bell Atlantic Communications, Inc., NYNEX Long Distance Company, TTI National, Inc., Teleconnect Long Distance Service & Systems and Verizon Select Services, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion for Full Intervention has been served by hand on those persons whose names appear below this 1st day of November, 2007.

John E. Selent Holly C. Wallace Edward T. Depp Dinsmore & Shohl LLP 1400 PNC Plaza 500 W. Jefferson Street Louisville, KY 40202

Douglas F. Brent