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January 14, 2008

RECEIVED
JAN 16 2008
PUBLIC SERVICE
COMMISSION

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

RE: Case No. 2007-00464

Dear Ms. O'Donnell:

Enclosed please find an original and ten copies of Cellco Partnership d/b/a Verizon Wireless' Motion for Full Intervention in the above reference case. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed stamped, self addressed envelope.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

Enclosures

105138.116493/506042.1

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JAN 16 2008
PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF THE KENTUCKY COMMISSION ON THE DEAF AND HARD OF HEARING TO EXPAND THE FUNDING BASE FOR THE KENTUCKY TELECOMMUNICATIONS ACCESS PROGRAM (TAP)	))))))	**CASE NO. 2007-00464**

MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8), Cellco Partnership, d/b/a Verizon Wireless ("Verizon Wireless")[1] submit this motion for full intervention in the above-captioned proceeding.

Verizon Wireless is a Commercial Mobile Radio Service ("CMRS") provider providing wireless voice and data services to customers in the Commonwealth of Kentucky pursuant to licenses issued by the Federal Communications Commission ("FCC"). Verizon Wireless competes with various CMRS providers in Kentucky, including at least two providers that requested intervention in this proceeding.

The Kentucky Commission on the Deaf and Hard of Hearing ("Petitioner") requests the Commission to order wireless telecommunications providers to begin collecting the Telecommunications Relay Service and the Telecommunications Access Program surcharges from their subscribers in the same manner as do wireline telecommunications providers. As the basis for this request, the Petitioner makes factual assertions about a number of topics, including (1) technology change affecting wireline and wireless carriers, (2) the alerting capability of

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[1] Cellco Partnership is a Delaware general partnership authorized to do business in Kentucky.

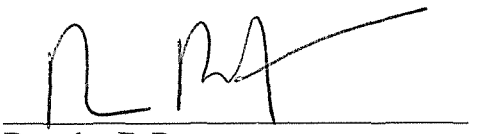
wireless devices, (3) demand for specialized equipment to meet the needs of hearing-impaired people, (4) wireless substitution, and (5) wireless growth. The Petition also states that new products are being introduced which will influence consumer decisions about "Internet and wireless based communication modes." Given these claims, the Commission will benefit from the perspective of each wireless carrier whose customers could be affected by any decision the Commission makes after hearing the Petition. Moreover, as the wireless business is highly competitive and consists of multiple networks and varying technologies, only Verizon Wireless can fully represent its own interest in ensuring that any decision resulting from the Petition is competitively neutral. Accordingly, Verizon Wireless is directly affected by the issues addressed in the Petition, and has a special interest in the proceeding that is not otherwise represented by any party. Thus, the interests of Verizon Wireless in this proceeding satisfy the requirements of the Commission's regulation for full intervention. 807 KAR 5:001 Section 3(8)(b).

By earlier order the Commission had directed that petitions for intervention be filed by January 7. Although this petition is being filed after that date, the Commission has not yet determined a procedural schedule, so neither the Petitioner nor any other person would be prejudiced by an order permitting Verizon Wireless to intervene. Filings, notices and other papers may be served on undersigned counsel for Verizon Wireless.

For the reasons stated above, Verizon Wireless requests that its Motion for Full Intervention be granted.

Dated: January 14, 2008

Respectfully submitted,



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Counsel for Verizon Wireless

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 14th day of January, 2008:

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Assistant Attorney General
Office of the Attorney General
Office of Rate Intervention
1024 Capital Center Drive, Suite 200
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Virginia L. Moore
Interim Executive Director
Kentucky Commission on the Deaf and Hard of Hearing
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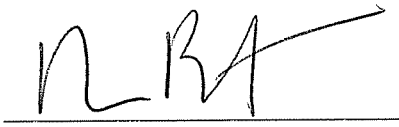

Douglas F. Brent