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September 15, 2008

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PUBLIC SERVICE
COMMISSION

VIA FEDERAL EXPRESS

Ms. Stephanie Stumbo
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602

Re: SouthEast Telephone, Inc., Complainant v. BellSouth Telecommunications, Inc.
d/b/a AT&T Kentucky, Defendant
KSPC 2008-00279

Dear Ms. Stumbo:

Enclosed for filing in the above-captioned case are the original and ten (10) copies of Opposition of AT&T Kentucky to CompSouth's Motion for Full Intervention.

Thank you for your attention to this matter.

Sincerely,

Mary K. Keyer
General Counsel/Kentucky

cc: Parties of Record

Enclosures

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

SOUTHEAST TELEPHONE, INC.)	
)	
Complainant,)	
)	
)	CASE NO. 2008-00279
BELLSOUTH TELECOMMUNICATIONS, INC.)	
d/b/a AT&T KENTUCKY)	
)	
Defendant.)	
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**OPPOSITION OF AT&T KENTUCKY TO
COMPSOUTH’S MOTION FOR FULL INTERVENTION**

BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky (“AT&T Kentucky”) hereby submits its opposition to CompSouth’s Motion for Full Intervention in the above-captioned proceeding. As explained herein, there is no basis to grant intervention to the Competitive Carriers of the South, Inc. (“CompSouth”) because CompSouth has not demonstrated the requisite interest in this proceeding to warrant its inclusion as an intervenor. In support of its motion, CompSouth states that it has “an obvious interest in the outcome of any proceeding related to BellSouth’s obligations to provide commingled network elements.” Motion at 2. In this case, however, there is no commingling issue or dispute between SouthEast Telephone, Inc. (“SouthEast”) and AT&T Kentucky regarding AT&T Kentucky’s “obligations to provide commingled network elements.”

As plainly stated in AT&T Kentucky’s Answer to SouthEast’s commingling complaint: *“AT&T Kentucky agrees that it is obligated to connect, attach or otherwise link a network element with a wholesale product or, per this Commission’s orders, a*

*section 271 element. . . . AT&T Kentucky is not refusing to commingle as a general proposition."*¹

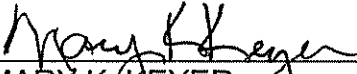
In response to AT&T Kentucky's Answer, SouthEast filed a response wherein SouthEast provided specifics regarding its commingling request – specifics which were not included in SouthEast's complaint.² On September 11, 2008, the parties held an informal conference with the Commission Staff. During the informal conference, it was made abundantly clear that there is no pending dispute between the parties regarding commingling obligations. Rather, AT&T Kentucky noted that it had not received a commingling order similar to the one recently submitted by SouthEast, and explained that it will take some time for AT&T Kentucky to develop a process to handle and provision such commingling orders.

AT&T Kentucky does not dispute that CompSouth members may have an interest in any proceeding involving an actual **dispute** over the scope of AT&T Kentucky's commingling obligations. That said, because there is no commingling dispute in this matter, the outcome of this case will have no impact on CompSouth's members. As such, CompSouth has shown no "special interest in the proceeding which is not otherwise adequately represented" nor is it likely that CompSouth will present issues or develop facts that assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings; therefore, in accordance with 807 KAR 5:001, Sec. 3(8)(b), CompSouth's motion for intervention should be denied.

¹ Answer of AT&T Kentucky at 2-3 (emphasis added; footnote omitted).

² SouthEast Telephone, Inc. Response to BellSouth Telecommunications, Inc. Answer.

Respectfully submitted,



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TELECOMMUNICATIONS, INC. D/B/A
AT&T KENTUCKY

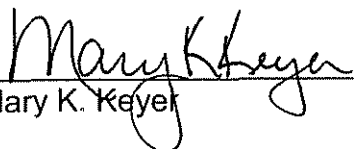
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CERTIFICATE OF SERVICE KPSC 2008-00279

It is hereby certified that a true and correct copy of the foregoing was served on the following individuals via U.S. Mail this 15th day of September 2008.

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