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September 5, 2008

Stephanie L. Stumbo Executive Director Kentucky Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, KY 40601 RECEIVED SEP - 8 2008

PUBLIC SERVICE

RE: Case No. 2008-00279 – Southeast Telephone v. BellSouth Telecommunications, Inc.

Dear Ms. Stumbo:

Enclosed are an original and ten copies of CompSouth's Motion for Full Intervention in the above referenced case.

Please indicate receipt of these filings by placing your file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Very truly yours,

STOLL KEENON OGDEN PLLE

Douglas F. Brent

DFB:

Enclosures

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COMMONWEALTH OF KENTUCKY

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BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	
SOUTHEAST TELEPHONE, INC.)
COMPLAINANT	
v.)) CASE NO. 2008-00279
BELLSOUTH TELECOMMUNICATIONS, INC., d/b/a AT&T KENTUCKY)))
DEFENDANT)

COMPSOUTH'S MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8), Competitive Carriers of the South, Inc. (hereinafter "CompSouth") submits this motion for full intervention in the abovecaptioned proceeding.

CompSouth, a Georgia non-profit corporation, is a trade organization representing the interests of twelve telecommunications carriers that compete with BellSouth Telecommunications, Inc. (and each other) throughout the nine Southern states in which BellSouth is an incumbent provider of local telecommunications services. All or nearly all of CompSouth's members were respondents in Case No. 2004-00427, the proceeding described in SouthEast Telephone's Complaint, and CompSouth participated in the proceeding as a formal intervenor. CompSouth has also intervened as a defendant in the United States District Court action (08-7) where BellSouth has challenged the Commission's orders in Case No. 2004-00427.

Acting on behalf of its members, CompSouth has an obvious interest in the outcome of any proceeding related to BellSouth's obligations to provide commingled network elements. The outcome of this case may, as a practical matter, affect CompSouth's ability to protect its interests. The Commission's disposition of SouthEast's complaint could easily affect how BellSouth will deal with CompSouth's member companies in the future. Thus, CompSouth has a special interest in the proceeding not otherwise represented by any party. Participation by CompSouth is likely to present issues that will assist the Commission without unduly complicating the proceedings. Therefore, CompSouth's interests in this proceeding satisfy the requirements of the Commission's regulation for full intervention. 807 KAR 5:001 Section 3(8)(b). Filings, notices and other papers may be served on undersigned counsel for CompSouth.

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

Respectfully submitted,

C. Kent Hatfield Douglas F. Brent STOLL KEENON OGDEN PLLC 2000 PNC Plaza 500 West Jefferson Street Louisville, Kentucky 40202 Phone: 502-568-5734 Fax: 502-333-6099 douglas.brent@skofirm.com

Counsel for CompSouth

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served on the

following by first-class United State mail, sufficient postage prepaid, this 5th day of

September, 2008.

Counsel to CompSouth

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