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October 23, 2014

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PUBLIC SERVICE
COMMISSION

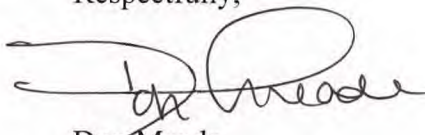
Jeff DeRouen, Executive Director
Kentucky Public Service Commission
P. O. Box 615
211 Sower Blvd.
Frankfort, KY 40601

**Re: Application of Windstream Kentucky East, LLC and Windstream Kentucky West, LLC (1) for a Declaratory Ruling That Approval is Not Required for the Transfer of a Portion of their Assets; (2) Alternatively for Approval of the Transfer of Assets; (3) for a Declaratory Ruling that Communications Sales and Leasing, Inc. is not subject to KRS 278.020(1); and (4) for All Other Required Approvals and Relief
Case No. 2014-00283**

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of Communications Workers of America's Motion for Full Intervention along with an original and ten copies of a Memorandum in Support of CWA Motion to Intervene.

Respectfully,



Don Meade

DM/sks
Enclosures

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PUBLIC SERVICE
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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF WINDSTREAM)	
KENTUCKY EAST, LLC AND)	
WINDSTREAM KENTUCKY WEST, LLC (1))	CASE NO. 2014-00283
FOR A DECLARATORY RULING THAT)	
APPROVAL IS NOT REQUIRED FOR THE)	
TRANSFER OF A PORTION OF THEIR)	
ASSETS; (2) ALTERNATIVELY FOR)	
APPROVAL OF THE TRANSFER OF ASSETS;)	
(3) FOR A DECLARATORY RULING THAT)	
COMMUNICATIONS SALES AND LEASING,)	
INC. IS NOT SUBJECT TO KRS 278.020(1);)	
AND (4) FOR ALL OTHER REQUIRED)	
APPROVALS AND RELIEF)	

**MOTION OF
COMMUNICATIONS WORKERS OF AMERICA
FOR FULL INTERVENOR STATUS**

Comes the Union, Communications Workers of America (CWA), and moves for full intervenor status in this action pursuant to 807 KAR 5:001(8). As grounds for the motion, CWA states as follows:

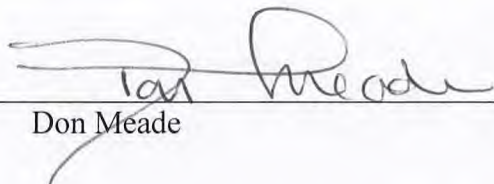
1. CWA is the authorized collective bargaining representative for more than 250 employees of Windstream Kentucky and its various subsidiaries.
2. CWA possesses the technical capabilities and experience in regulatory matters arising from its national involvement with Windstream and its affiliated entities, as demonstrated by its full and active participation in the spin-off/merger case of PSC Case 2005-00534, and subsequent proceedings, where CWA was granted full intervenor status and presented expert testimony.

3. Many of CWA's members who are employees of Windstream Kentucky are also customers of Windstream Kentucky.
 4. CWA desires to participate in this proceeding to ensure that the interests of its members, as employees and customers of Windstream Kentucky are fully protected and represented in this matter.
 5. No other party to this proceeding represents the interests of CWA and its members.
 6. CWA intends to actively participate in this proceeding on these and such other matters that affect its interests. Such participation may include participation in any hearings, presenting testimony, cross-examining witnesses, and filing briefs and other pleadings consistent with the scope of the Commission's investigation.
 7. CWA notes that there is very little information in the Application about any of the potential impacts of the transaction on Windstream Kentucky customers and employees. The Applicants have not yet filed testimony or any supporting exhibits and no procedural schedule has yet issued. No party should be prejudiced by the intervention of CWA.
 8. The CWA, as the representative of the workers of Windstream Kentucky, shares a common interest with the public and other parties in the quality of service, economy, safety and business viability of the proposed transaction. The CWA brings to these proceedings particular expertise arising from actual involvement in operational aspects of Windstream Kentucky operations and can make a valuable contribution to the understanding, clarification and development of issues that fall within the Commission's regulatory authority.
- CWA respectfully moves the PSC to grant it full intervenor status.

Respectfully submitted,

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By  _____
Don Meade

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 23rd day of October, 2014, via U.S. mail, postage prepaid.

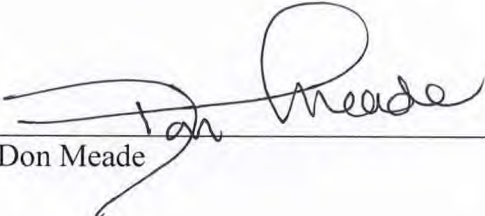
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