



Lexington-Fayette Urban County Government
DEPARTMENT OF LAW

Jim Gray
Mayor

Janet M. Graham
Commissioner

August 10, 2015

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

AUG 11 2015

**PUBLIC SERVICE
COMMISSION**

Re: Case No. 2015-00227
(Application of BellSouth)

Dear Mr. Derouen:

Please find enclosed herewith for filing an original and ten (10) copies of Lexington-Fayette Urban County Government's Motion to Intervene in the referenced matter.

Yours truly,

A handwritten signature in blue ink, appearing to read "David J. Barberie".

David J. Barberie
Managing Attorney

ENC

00497179

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 11 2015

PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF BELLSOUTH)
TELECOMMUNICATIONS, LLC FOR)
DECLARATORY ORDER REGARDING)
INTERCONNECTION WITH CENTRAL)
KENTUCKY NETWORK FOR 911/E911)
SERVICES TO PUBLIC SAFETY)
ANSWERING POINTS)

CASE NO.
2015-00227

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S MOTION TO INTERVENE**

COMES the Lexington-Fayette Urban County Government ("LFUCG"), by counsel and pursuant to 807 KAR 5:001 Section 3(8), and moves that it be granted leave to intervene in this matter and that it be granted full intervention status. Approval of the application in this matter will have a significant impact on LFUCG as it is the local government primarily responsible for the administration and maintenance of the Central Kentucky 9-1-1 Network pursuant the agreements under which the network was created and operates and it uses the network to provide services to the citizens of Lexington-Fayette County. To the extent appropriate and necessary, LFUCG also moves to intervene on behalf of the Central Kentucky 9-1-1 Network.

LFUCG has a special interest in this matter, and it will not be adequately represented by the other parties. LFUCG's participation in this matter is also likely to assist the Commission in developing and identifying facts and issues and in fully considering this matter without unduly complicating or disrupting the proceedings.

Respectfully submitted,

By: 

David J. Barberie
dbarberi@lexingtonky.gov
Managing Attorney

Melissa M. Murphy
mmurphy@lexingtonky.gov
Janet M. Graham
jgraham@lexingtonky.gov
Department of Law
200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500
Attorneys for Lexington-Fayette Urban County
Government

FILING NOTICE AND CERTIFICATE

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, on August 10, 2015:

BellSouth Telecommunications, LLC d/b/a AT&T
601 W. Chestnut Street
4th Floor East
Louisville, KY 40203

J. Tyson Covey and
Dennis G. Friedman
Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606

Hon. Robert C. Moore
Attorney at Law
Hazelrigg & Cox, LLP
415 West Main Street
P.O. Box 676
Frankfort, KY 40602



ATTORNEY FOR LEXINGTON-FAYETTE
URBAN COUNTY GOVERNMENT