

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 26 2015

In the Matter of:

APPLICATION OF BELLSOUTH )  
TELECOMMUNICATIONS. LLC FOR )  
DECLARATORY ORDER REGARDING ) CASE NO.  
INTERCONNECTION WITH CENTRAL ) 2015-00227  
KENTUCKY NETWORK FOR 911/E911 )  
SERVICES TO PUBLIC SAFETY )  
ANSWERING POINTS )

PUBLIC SERVICE  
COMMISSION

MARION COUNTY, KENTUCKY'S RESPONSE  
TO VERIFIED PETITION FOR DECLARATORY ORDER

Comes Marion County, Kentucky ("Marion County"), by counsel and pursuant to 807 KAR 5:001 Section 19(4), and files the following as its response to BellSouth Telecommunications, Inc.'s, d/b/a AT&T Kentucky ("AT&T Kentucky"), Verified Petition for Declaratory Order. To the extent appropriate and necessary this response shall also serve as the response of the Central Kentucky 9-1-1 Network (the "Network").

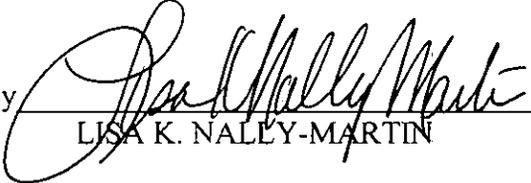
Marion County respectfully requests that this matter be dismissed as the Public Service Commission lacks jurisdiction over the Network. Alternatively, Marion County requests that the relief requested in this matter be denied in its entirety. Finally, in the event that the Public Service Commission finds that the Network is a regulated utility, Marion County reserves the right to request further relief pursuant to KRS 278.512(2).

1. Marion County operates the Public Safety Answering Points (PSAPs or dispatch centers) for Marion County, and also provides selective routing and hosts Customer Premise

Equipment ("CPE") for 911 and E911 call answering for Marion County.

Respectfully submitted,

**OFFICE OF THE MARION COUNTY ATTORNEY**  
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By   
LISA K. NALLY-MARTIN

### FILING NOTICE AND CERTIFICATE

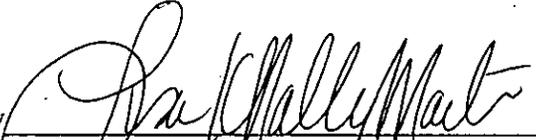
I hereby certify that an original and ten (10) copies of this Response were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, on August 25, 2015:

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