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RECEIVED

MAR 8 2004

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J.D./M.B.A.  
LICENSED IN KENTUCKY, OHIO AND COLORADO

March 5, 2004

Mr. Thomas M. Dorman  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602

C.N. 19000382

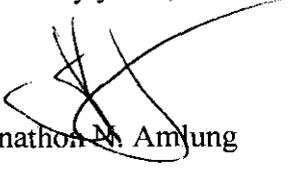
**RE: In the Matter of: An Inquiry into the Development of Deaveraged Rates for Unbundled Network Elements, Administrative Case No. 382**

Dear Mr. Dorman:

Please find enclosed for filing an original and ten (10) copies of SouthEast Telephone's Motion to Intervene, for filing in the above-referenced case.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions or concerns.

Cordially yours,

  
Jonathon N. Amlung

Enclosures

cc: SouthEast Telephone, Inc.

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

RECEIVED  
MAR 8 2004  
PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

**AN INQUIRY INTO THE DEVELOPMENT )  
OF DEAVERAGED RATES FOR UNBUNDLED ) ADMINISTRATIVE  
NETWORK ELEMENTS ) CASE NO. 382**

**MOTION FOR LEAVE TO INTERVENE**

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COMMISSION

Comes now SouthEast Telephone, Inc. ("SouthEast"), by and through counsel, and hereby Petitions this Honorable Commission pursuant to 807 KAR 5:001, Section 3, for an Order permitting it to Intervene as a party in this case. In support of this Petition, SouthEast states as follows:

1. On November 7, 2003, this Commission ordered Kentucky ALLTEL, Inc. ("ALLTEL") to file proposed UNE rates with supporting documentation to empower the Commission to establish de-averaged UNE rates for ALLTEL. The Commission also ordered ALLTEL to submit proposed rates for UNE combinations (the "UNE-platform") based on representations ALLTEL made to the Commission in this proceeding.

2. On February 5, 2004, ALLTEL provided the Commission with a document it entitled "Unbundled Network Element Cost Study," but failed to provide supporting documentation. In response, the Commission ordered ALLTEL to file detailed information supporting its documentation no later than March 1, 2004.

3. SouthEast Telephone, Inc. ("SouthEast"), is a competitive local exchange carrier ("CLEC"), with its principle place of business located in Pikeville, Kentucky. SouthEast is in the process of seeking approval from the Commission of an Interconnection Agreement with ALLTEL that will allow SouthEast to provide

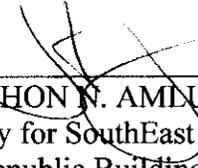
telecommunications services within parts of ALLTEL's territories in Kentucky. This case involves issues that are obviously relevant to SouthEast's business, i.e., the very rates at which SouthEast will be purchasing unbundled network elements from ALLTEL.

3. SouthEast provides services to thousands of rural customers in Kentucky, giving it a unique position and perspective. Should SouthEast be permitted full intervention, it will be able to help develop facts that will assist the Commission in full consideration of this matter. Should this Commission permit SouthEast to intervene in this case, SouthEast will comply with the existing docketing schedule, so as to not unduly burden the Commission, the staff attorneys or the parties in this case.

4. SouthEast requests that it be granted leave for full intervention with the right to fully participate in this proceeding as a party, and that the undersigned counsel for SouthEast be served with filed testimony, exhibits, pleadings, correspondence and all other documents submitted by parties and be certified as a party for the purposes of receiving service of any petition for rehearing or judicial review.

WHEREFORE, in recognition of the foregoing, SouthEast respectfully requests that the Commission permit SouthEast to intervene fully as a party of record in this proceeding.

Respectfully submitted,



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**CERTIFICATION**

I hereby certify that a true and correct copy of the foregoing was mailed, this the 5<sup>th</sup> day of March, 2004, to:

James H. Newberry, Jr.  
Noelle M. Holladay  
Wyatt, Tarrant & Combs, LLP  
Attorney for Kentucky ALLTEL, Inc.  
250 W. Main Street, Suite 1600  
Lexington, KY 40507-1746

  
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JONATHAN N. AMLUNG