

# STOLL·KEENON·OGDEN

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January 9, 2006

Ms. Elizabeth O'Donnell Executive Director Kentucky Public Service Commission P.O. Box 615 Frankfort, KY 40602 PUBLIC SERVICE COMMISSION

RE: Case No. 2005-00534 - Kentucky Alltel, Inc., And Alltel Kentucky, Inc.'s Intent To Transfer Assets to Valor Communications Group, Inc.

Dear Ms. O'Donnell:

Enclosed for filing is Kentucky Telephone Company's Motion for Full Intervention in the above proceeding. Please mark one copy as received and return it in the enclosed pre-paid envelope. Thank you.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

c: Joe McClung

#### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	RECEIVED		
in the Matter of.			JAN 12 2006
KENTUCKY ALLTEL, INC., AND ALLTEL	)		PUBLIC SERVICE
KENTUCKY, INC.'S INTENT TO TRANSFER	)		COMMISSION
ASSETS TO VALOR COMMUNICATIONS	)	CASE NO.	
GROUP, INC.	)	2005-00534	

## KENTUCKY TELEPHONE COMPANY'S MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8), Bluegrass Telephone Co., Inc. d/b/a Kentucky Telephone Company ("KTC") submits this motion for full intervention in the above-captioned proceeding.

KTC is a utility which interconnects with and is party to an interconnection agreement with Kentucky ALLTEL, Inc., an applicant in this matter. Participation by KTC is likely to present issues that will assist the Commission without unduly complicating the proceedings. KTC has a special interest in the proceeding not otherwise represented by any party. The Commission has routinely granted intervention to competitive carriers who interconnect with an incumbent carrier seeking permission to transfer ownership. Filings, notices and other papers may be served on undersigned counsel for KTC.

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

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion for Intervention has been served by U.S. mail on those persons whose names appear below this 9<sup>th</sup> day of January, 2006.

Douglas F. Brent

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