

December 27, 2005

DEPARTMENT OF LAW

Ms. Beth O'Donnell Executive Director Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602-0615 RECEIVED DEC 2 8 2005 PUBLIC SERVICE COMMISSION

## Re: Case No. 2005-00534 (Kentucky Alltel, Inc. Application for Approval of Transfer)

Dear Ms. O'Donnell:

Please find enclosed herewith for filing an original and 10 copies of the Lexington-Fayette Urban County Government's Motion to Intervene in the referenced matter. Please contact me should you have any questions pertaining to the same.

Yours truly,

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David J. Barberie Corporate Counsel

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cc: Distribution List

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

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DEC 2 8 2005

PUBLIC SERVICE

In the Matter of:

KENTUCKY ALLTEL, INC., AND ALLTEL KENTUCKY, INC.'S INTENT TO TRANSFER ASSETS TO VALOR COMMUNICATIONS GROUP, INC.

CASE NO. 2005-00534

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

COMES the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel, and moves for full intervenor status in this action pursuant to 807 KAR 5:001, Section 3(8), to the fullest extent allowable by law, on behalf of itself and the residents of Fayette County, Kentucky, as this action may impact and affect Fayette County and its residents, and the LFUCG has previously participated as an intervenor in cases related to the applicants and in previous transfer proceedings involving utilities with significant operations in Fayette County, Kentucky.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT Department of Law 200 East Main Street Lexington, Kentucky 40507 (859) 258-3500

BY:

David J. Barberie Corporate Counsel Leslye M. Bowman Director of Litigation ATTORNEYS FOR LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

#### **CERTIFICATE OF SERVICE**

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served by first class U.S. Mail delivery, postage prepaid, to Beth O'Donnell, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail delivery, postage prepaid, on the following, all on this the  $\frac{2.7m}{day}$  day of

December 2005.

Hon. Amy Dougherty Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, Kentucky 40602-0615

Hon. Dennis Howard Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40601-8204

Daniel Logsdon Alltel Kentucky, Inc. 229 Lees Valley Road Shepherdsville, Kentucky 40165

#### <u>and</u>

Kentucky Alltel, Inc. 130 West New Circle Road Suite 170 Lexington, Kentucky 40505 Steve Mowery ALLTEL Communications, Inc. One Allied Drive P. O. Box 2177 Little Rock, AR 72203-2177

James H. Newberry, Jr., Esq. Wyatt, Tarrant & Combs, LLP 250 West Main Street Suite 1600 Lexington, KY 40507-1746 jnewberry@wyattfirm.com

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ATTORNEY FOR LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

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