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APR 1 3 2006

PUBLIC SERVICE COMMISSION

April 13, 2006

Via Hand Delivery

Hon. Beth O'Donnell Executive Director Public Service Commission 211 Sower Blvd. Frankfort, KY 40601

### Re: In the Matter of: Supplemental Petition of Cinergy Communications Company for Designation as an Eligible Telecommunications Carrier in Additional Service Areas; Case No. 2006-00089

Dear Executive Director O'Donnell:

I have enclosed for filing in the above-styled case the original and eleven (11) copies of South Central Rural Telephone Cooperative Corporation, Inc.'s Motion for Full Intervention in this matter. Please file stamp one of the copies and return it to our courier.

Thank you, and if you have any questions, please call me.

Sincerely,

Edward T. Depp

ETD/lb Enclosures cc: John E. Selent, Esq. (w/o encl.) Holly C. Wallace, Esq. (w/o encl.)

> 1400 PNC Plaza, 500 West Jefferson Street Louisville, KY 40202 502.540.2300 502.585.2207 fax www.dinslaw.com

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

APR 1 3 2006

Supplemental Petition of Cinergy Communications Company for Designation as an Eligible Telecommunications Carrier in Additional Service Areas PUBLIC SERVICE COMMISSION Case No. 2006-00089

#### **MOTION FOR FULL INTERVENTION**

South Central Rural Telephone Cooperative Corporation, Inc. ("South Central"), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), pursuant to 807 KAR 5:001 §8, for full intervention in the above-captioned matter. In support of its motion, South Central states as follows.

1. The full name and address of South Central is South Central Rural Telephone Cooperative Corporation, Inc., P.O. Box 159, 1399 Happy Valley Road, Glasgow, Kentucky 42142-0159. South Central is a rural incumbent local exchange carrier ("ILEC") which provides local exchange services to residents of its approved service territory.

2. South Central is the ILEC in the service territory for which Cinergy Communications Company ("Cinergy") is presently seeking eligible telecommunications carrier ("ETC") status. Accordingly, South Central's full intervention in this matter is necessary to ensure that Cinergy's application for ETC status is thoroughly and fully investigated.

3. Absent full intervention in this proceeding, South Central's substantial interests in this matter will not be adequately represented.

4. Granting full intervention to South Central will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

**WHEREFORE,** South Central respectfully requests that the Commission grant its motion for a full intervention in this proceeding.

Respectfully submitted,

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John E. Selent Edward T. Depp Holly C. Wallace **DINSMORE & SHOHL LLP** 1400 PNC Plaza 500 W. Jefferson Street Louisville, KY 40202 (502) 540-2300 (Office) (502) 585-2207 (Fax) john.selent@dinslaw.com (E-Mail) tip.depp@dinslaw.com (E-Mail) holly.wallace@dinslaw.com (E-Mail)

## COUNSEL TO SOUTH CENTRAL RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

# **CERTIFICATE OF SERVICE**

It is hereby certified that a true and accurate copy of the foregoing was served via First Class United States Mail, postage prepaid, to the following individuals this is day of April, 2006:

C. Kent Hatfield Douglas F. Brent Stoll Keenon Ogden PLLC 2650 Aegon Center 400 West Market Street Louisville, Kentucky 40202 *Counsel to Cinergy Communications Company* 

David L. Sieradzki Hogan & Hartson, LLP 555 – 13<sup>th</sup> St., N.W. Washington, D.C. 20004 *Counsel to Cinergy Communications Company* 

Counsel to South Central Rural Telephone Cooperative Corporation, Inc.