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January 18, 2007

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

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COMMISSION

RE: 2007-00004

Dear Ms. O'Donnell:

Enclosed please find an original and ten copies of Xspedius Management Co. Switched Services, LLC d/b/a Xspedius Communications' ("Xspedius") Motion for Full Intervention in the above-mentioned case. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Sincerely yours,

STOLL KEENON OGDEN, PLLC

Douglas F. Brent

Enc.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Brandenburg Telephone Company; Duo County Telephone)
Cooperative Corporation, Inc.; Highland Telephone)
Cooperative, Inc.; Mountain Rural Telephone Cooperative)
Corporation, Inc.; North Central Telephone Cooperative)
Corporation; South Central Telephone Cooperative)
Corporation, Inc.; and West Kentucky Rural Telephone)
Cooperative Corporation, Inc.)
Complainants)
v.)
Windstream Kentucky East, Inc and Windstream Kentucky)
West, Inc.)
Defendants)

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CASE NO.
2007-000004

MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8), Xspedius Management Co. Switched Services, LLC d/b/a Xspedius Communications (“Xspedius”) submits this motion for full intervention in the above-captioned proceeding.

Xspedius is a utility which interconnects with and is party to interconnection agreements with each of the Defendants in this matter. Those agreements provide for transit service at rates which are different than the rate contained in the Windstream tariff being challenged by the Complainants.

The availability of transit service will always be critical to a competitive local telecommunications market in Kentucky. While the terms and prices in the tariff may not apply today to traffic exchanged between Xspedius and Windstream, the tariff will likely establish a

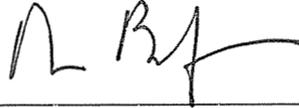
price floor for future negotiations between Windstream and any carrier needing transit service. Windstream will have little incentive to agree to a rate lower than the tariffed rate if it can simply default to the tariff and demand a rate much higher than would result from meaningful negotiations.

Participation by Xspedius is likely to present issues that will assist the Commission without unduly complicating the proceedings. There are other issues related to transit arrangements not raised directly by Complainants yet critical in any investigation of Windstream's tariff filing. One issue relates to the general question of how transit arrangements should be determined. In a recent arbitration proceeding where Xspedius was a petitioner, the Commission confirmed that transit service is subject to the negotiation and arbitration provisions of the Telecommunications Act.¹ Windstream's tariff may be an attempt to avoid that determination in future arbitrations. Whether or not that is a motive, the tariff could short circuit the process for establishing transit arrangements. Second, Windstream has provided no cost support for the transit rate. Any default rate for transit service, a § 251 element, should be set at TELRIC. Thus, Xspedius has a special interest in the proceeding not otherwise represented by any party.

Filings, notices and other papers may be served on undersigned counsel for Xspedius.

¹ *In the Matter of Joint Petition for Arbitration of NewSouth Communications Corp., Nuvox Communications, Inc., KMC Telecom V, Inc., KMC Telecom III LLC, and Xspedius Communications, LLC on behalf of its operating subsidiaries Xspedius Management Co. of Lexington, LLC and Xspedius Management Co. of Louisville, LLC of an Interconnection Agreement with BellSouth Telecommunications, Inc., Case No. 2004 - 00044, Order, September 26, 2005 at 15.*

For the reasons stated above, Xspedius 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 18th day of January, 2006.



Douglas F. Brent

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