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NOV 07 2007
PUBLIC SERVICE
COMMISSION

November 6, 2007

VIA FEDERAL EXPRESS

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

Re: *In the Matter of: Notice of Intent of North Central Telephone Cooperative Corporation to File Rate Application, Case No. 2007-00162*

Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original and eleven (11) copies of North Central Telephone Cooperative Corporation's Response to Motion for Full Intervention. Please return a file-stamped copy in the self-addressed, postage prepaid envelope furnished herewith.

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

Very truly yours,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk

Enclosures

cc: F. Thomas Rowland
Johnny McClanahan

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

NOTICE OF INTENT OF NORTH)
CENTRAL TELEPHONE)
COOPERATIVE CORPORATION)
TO FILE RATE APPLICATION)

Case No. 2007-00162

RESPONSE TO MOTION FOR FULL INTERVENTION

North Central Telephone Cooperative Corporation ("North Central"), by counsel, hereby submits to the Public Service Commission of the Commonwealth of Kentucky (the "Commission") this objection to the motion for full intervention by MCImetro Transmission Access Transmission Services, LLC, d/b/a Verizon Access Transmission Services, MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc., Teleconnect Long Distance Services & Systems d/b/a Telecom*USA and Verizon Select Services, Inc. (collectively, "Verizon"). In support of its request, North Central states as follows.

Full intervention in a Commission proceeding may be granted only if the party seeking intervention can show "[(1) it] has a **special interest** in the proceeding which is not otherwise adequately represented or [(2)] that full intervention by [the] party is **likely to present issues or to develop facts that assist** the commission in fully considering the matter **without unduly complicating** or disrupting the proceedings. . ." 807 KAR 5:001, Section 3(8)(b)(emphasis supplied).

Contrary to the conclusory allegations stated in its motion, Verizon does not have a special interest in this proceeding which would warrant intervention. Verizon is not a member of the North

Central co-op; rather, Verizon is an interexchange carrier that "provides interexchange service in Kentucky and purchases tarriffed access services from North Central." (Verizon's motion for full intervention, p.1.) The rate adjustment application in this action seeks to alter rates and charges for basic residential and business rates. North Central does not seek to alter access rates — the only rates applicable to Verizon. As a result, the rate adjustment application does not, in any way, affect Verizon.

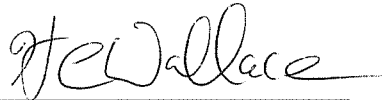
Moreover, Verizon's supposed interest in North Central's request to waive filing requirements related to certain jurisdictional summaries does not constitute a special interest within the meaning of 807 KAR 5:001, section 3(8)(b). Verizon cannot have a special interest in a filing requirement associated with an application to increase rates Verizon does not pay. In addition, Verizon is not rate regulated; thus the filing requirements do not and will not apply to Verizon. Ultimately, because Verizon is not a North Central member, it does not pay the rates North Central seeks to increase, and it is not subject to the filing requirements for rate applications, Verizon does not have a special interest in this matter as contemplated by the regulation. *See e.g. In Re: An Investigation of the Financial Condition of East Kentucky Power Cooperative, Inc.*, Public Service Commission of Kentucky, Case No. 2006-00455 (Jan. 30 2007).

As an access provider, Verizon is not among one of North Central's residential or business customers, and, therefore, cannot present issues or develop facts which would aid the Commission in exploring this matter. *See Id.* Moreover, in its motion, Verizon does not represent any specific issue with which it could assist the Commission in this matter. Verizon's inability to provide the Commission with additional helpful information for consideration in this matter, mandates the conclusion that the motion should be denied.

Given that Verizon is not a North Central residential or business customer, and does not assert a specific issue for which it may assist the Commission, allowing intervention in this instance would solely serve to complicate these proceedings. *See e.g. In Re: An Investigation into East Kentucky Power Cooperative, Inc.'s Continued Need for Certification Generation*, Public Service Commission of Kentucky, Case No. 2006-00564 (April 19, 2007).

WHEREFORE, North Central respectfully requests that the Commission deny Verizon's motion for full intervention in this proceeding.

Respectfully submitted,



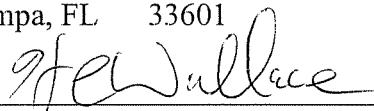
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served on the following via email and U.S. first class mail, postage pre-paid this 6th day of November, 2007.

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