



AT&T Kentucky
601 W. Chestnut Street
Room 407
Louisville, KY 40203

T: 502.582.8219
F: 502.582.1573
mary.keyer@att.com

January 4, 2008

RECEIVED

JAN 04 2008
PUBLIC SERVICE
COMMISSION

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602


Re: Petition of the Kentucky Commission on the Deaf and Hard of Hearing
To Expand the Funding Base for the Kentucky Telecommunications
Access Program (TAP)
PSC 2007-00464

Dear Ms. O'Donnell:

Enclosed for filing in the above-captioned case are the original and ten (10)
copies of AT&T's Motion for Full Intervention.

Thank you for your attention to this matter

Sincerely,


Mary K. Keyer
General Counsel-KY

cc: Parties of Record

Enclosures

700405

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JAN 04 2008

**PUBLIC SERVICE
COMMISSION**

In the Matter of:

PETITION OF THE KENTUCKY COMMISSION)
ON THE DEAF AND HARD OF HEARING TO)
EXPAND THE FUNDING BASE FOR THE)
KENTUCKY TELECOMMUNICATIONS ACCESS)
PROGRAM (TAP))

Case No. 2007-00464

MOTION FOR FULL INTERVENTION

BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky (“AT&T Kentucky”), and New Cingular Wireless PCS, LLC, and Cincinnati SMSA Limited Partnership d/b/a AT&T Mobility f/k/a Cingular Wireless (“AT&T Mobility”) (collectively, “AT&T”), by counsel, hereby move the Public Service Commission of the Commonwealth of Kentucky (the “Commission”), to grant AT&T full intervention in the above-captioned matter, pursuant to 807 KAR 5:001, Section 3(8)(b).

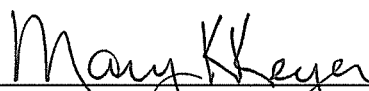
In support of its motion, AT&T states that AT&T Mobility is a wireless provider of services in the Commonwealth of Kentucky and any ruling by the Commission in this case could have a direct impact on AT&T Mobility and its customers. As such, AT&T Mobility has a special interest in the case not otherwise adequately represented by any other party. AT&T Kentucky is a provider of local exchange service throughout the Commonwealth of Kentucky and collects both Telecommunications Relay Services (TRS) and Telecommunications Access Program (TAP) surcharges from its customers for distribution by the Commission. As such, AT&T Kentucky stands to be impacted by any ruling by the Commission in this case and has a special interest in the proceeding not adequately represented by any other party. AT&T Kentucky’s participation will more

likely be of a monitoring nature, or one of presenting issues or developing facts that will assist the Commission in fully considering the matters before it without unduly complicating or disrupting the proceedings.

It is appropriate, therefore, that AT&T Mobility and AT&T Kentucky be made parties to the case and be served with all testimony, pleadings, correspondence and all other documents submitted by parties on the undersigned counsel for AT&T.

For the foregoing reasons, AT&T respectfully requests that the Kentucky Public Service Commission grant this motion for full intervention in this case.

Respectfully submitted,



Mary K. Keyer
General Counsel/AT&T Kentucky
601 West Chestnut Street, Room 407
Louisville, KY 40203
(502) 582-8219
mary.keyer@att.com

ATTORNEY NEW CINGULAR WIRELESS
PCS, LLC, AND CINCINNATI SMSA
LIMITED PARTNERSHIP D/B/A AT&T
MOBILITY f/k/a CINGULAR WIRELESS

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was served on the following individuals by mailing a copy thereof, this 4th day of January, 2008.

Lawrence W. Cook
Assistant Attorney General
Office of the Attorney General
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Virginia L. Moore
Interim Executive Director
Kentucky Commission on the Deaf
and Hard of Hearing
632 Versailles Road
Frankfort, KY 40601



Mary K. Keyer