

# STOLL·KEENON·OGDEN

PLLC

2000 PNC PLAZA 500 WEST JEFFERSON STREET LOUISVILLE, KY 40202-2828 MAIN: (502) 333-6000 FAX: (502) 333-6099 www.skofirm.com **DOUGLAS F. BRENT** DIRECT DIAL: 502-568-5734 douglas.brent@skofirm.com

RECEIVED

February 26, 2010

MAR 0 1 2010 UBLIC SERVICE COMMISSION

Jeff DeRouen Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601

Re: BellSouth Telcommunications, Inc. d/b/a Southeast d/b/a AT&T Kentucky

v. BLC Management LLC d/b/a Angles Communications Solutions

Case No. 2010-00023

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of BLC Management LLC d/b/a Angles Communications Solutions ("Angles") Response to Motion to Consolidate in the above referenced case.

Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copy and return them to me via the enclosed, self-addresses, stamped envelope.

Sincerely yours,

Douglas F. Brent

DFB:jms Enclosures

cc: Parties of Record

#### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

OMMISSION	RECEIVED
	PUBLIC SERVICE COMMISSION
	OWIMISSION
Case No. 2010-	00023

Bellsouth Telecommunications, Inc. d/b/a )
Southeast d/b/a AT&T Kentucky )

Complainant )

v.

BLC Management LLC d/b/a Angles Communications Solutions

Defendant

#### RESPONSE TO MOTION TO CONSOLIDATE

BLC Management LLC d/b/a Angles Communications Solutions ("Angles" or "Defendant") opposes BellSouth Telecommunications, Inc.'s motion to consolidate this complaint case with other cases, for the reasons set forth in the opposition filings of dPi Teleconnect (in Case No. 2010-00029) and Budget Prepay, Inc. (in Case No. 2010-00025).

Respectfully submitted,

Henry M. Walker

In the Matter of:

(admission under SCR 3.030 to be obtained)
BRADLEY ARANT BOULT CUMMINGS LLP

1600 Division Street

Suite 700

Nashville, TN 37203

Telephone: (615) 244-2582

By: Douglas F. Brent

STOLL KEENON OGDEN PLLC

2000 PNC Plaza

500 West Jefferson Street Louisville, Kentucky 40202

Telephone: (502) 333-6000

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served by First Class Mail on those persons whose names appear below this 26th day of February, 2010.

Mary K. Keyer AT&T Kentucky 601 West Chestnut Street Suite 407 Louisville, Kentucky 40203

Douglas F. Brent