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PUBLIC SERVICE COMMISSION

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

June 29, 2012

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

RE: YMax Communications Corp. Revision to Kentucky Tariff No. 2, Switched

Access Services
Case No. 2012-00257

Dear Mr. DeRouen:

Enclosed please find and accept for filing the original and ten copies of Verizon's Motion for Full Intervention in the above-referenced matter.

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 it to me in the enclosed self-addressed, stamped envelope.

Should you have any questions, please contact me at your convenience.

Very truly yours,

STOLL KEENON OGDEN, PLLC

Douglas F. Brent

DFB/ec Enclosures

cc: Parties of Record

105138.116493/835976.1

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

YMAX COMMUNICATIONS CORP.)	
REVISION TO KENTUCKY TARIFF NO. 2,)	CASE NO. 2012-00257
SWITCHED ACCESS SERVICES)	

VERIZON'S MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8), 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 Service & Systems d/b/a Telecom*USA and Verizon Select Services, Inc. (collectively, "Verizon") submit this motion for intervention in the above-captioned proceeding.

- 1. Verizon is a long distance carrier (sometimes known as an interexchange carrier or "IXC") and, in that capacity, purchases intrastate switched access services from a number of different Kentucky ILECs and CLECs, and is likely to terminate intrastate toll traffic to dialed numbers assigned to YMAX Communications Corp., the CLEC whose rates have been suspended under the Commission's Order dated June 28, 2012.
- 2. By letter dated June 20, 2012, Verizon objected to the YMAX tariff filing at issue. Subsequently, the Commission suspended the tariff in response to a complaint that had been filed by AT&T-Kentucky.
- 3. As an intrastate switched access ratepayer, Verizon has a direct interest in any examination of intrastate switched access rates that will occur in this proceeding. Moreover, as a

result of its experience as a ratepayer and having participated in multiple proceedings before the Commission regarding Kentucky intrastate switched access rates,¹ as well as in the Federal Communication Commission proceeding² pertinent to the tariff being investigated, Verizon is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating the proceedings, as it has before.

- 4. No other entity adequately can represent Verizon's direct interest in this case. Thus, Verizon's interests in this proceeding satisfy the requirements of the Commission's regulation for intervention. *See* 807 KAR 5:001, Section 3(8).
- 5. The attorney for Verizon authorized to represent it in this proceeding and to take service of all documents is:

Douglas F. Brent STOLL KEENON OGDEN PLLC 2000 PNC Plaza 500 West Jefferson Street Louisville, KY 40202-2828 Telephone: 502-568-5734

Facsimile: 502-562-0934 Email: douglas.brent@skofirm.com

WHEREFORE, Verizon respectfully requests that it be granted full intervenor status in the above-captioned proceeding.

¹ See, e.g., Case No. 2007-00503, MCI Communications Services, et al. v. Windstream Kentucky West, Inc., et al.(complaint concerning ILEC access rates); Case No. 2010-00398, Investigation into Intrastate Switched Access Rates of all Kentucky Incumbent and Competitive Local Exchange Carriers.

² See generally Connect America Fund, et al., 26 FCC Rcd 17663 (Nov. 18, 2011).

Dated: June 29, 2012

Respectfully submitted,

Douglas F. Brent

STOLL KEENON OGDEN PLLC

2000 PNC Plaza

500 West Jefferson Street

Louisville, KY 40202-2828

Telephone: 502-568-5734 Facsimile: 502-562-0934 douglas.brent@skofirm.com

Counsel for Verizon

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the above and foregoing Motion for Full Intervention has been served upon the following persons by first class United States mail, on the 29th day of June, 2012:

Peter Russo Chief Financial Officer YMax Communications Corp. 5700 Georgia Avenue West Palm Beach, FL 33405 Mary K. Keyer General Counsel / Kentucky BellSouth Telecommunications, LLC d/b/a AT&T 601 W. Chestnut Street, 4th Floor East Louisville, KY 40203

Sharon Thomas Technologies Management, Inc. P. O. Drawer 200 Winter Park, FL 32790-0200

Counsel for Verizon