

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)
COMMISSION'S TRIENNIAL REVIEW ORDER) CASE NO. 2003-00379
REGARDING UNBUNDLING REQUIREMENTS)
FOR INDIVIDUAL NETWORK ELEMENTS)

MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8) and Ordering paragraph 1 of the Order issued October 2, 2003, in the above-captioned proceeding, NewSouth Communications Corp. ("NewSouth") submits this motion for full intervention in the above-captioned proceeding.

NewSouth is a utility authorized to provide competitive services in Kentucky. As a competitive local carrier ("CLEC"), NewSouth has a direct interest in the Section 251 unbundling obligations of incumbent local exchange carriers. NewSouth has participated informally in this proceeding as a member of the CompSouth coalition, including through hosting a facility tour during an informal conference held January 14. Moreover, the Commission staff has made an informal request that NewSouth file certain information related to capacity of the Lucent switch at NewSouth's Louisville facility. Intervention is requested at this time to enable NewSouth to participate formally in this matter.

NewSouth's participation is likely to present issues that will assist the Commission without unduly complicating the proceeding. The procedural orders establishing this case essentially provide for intervention as a matter of right by notice to other parties.

This motion is being filed electronically pursuant to procedures established in the Commission's November 4, 2003 scheduling order. A copy of this motion is being sent via first class mail to all parties known to have refused electronic service and to the Kentucky Cable Television Association, as required by the November 4 order.

NewSouth agrees to accept electronic service of filings and orders in this proceeding via electronic notices from the Commission. Postal mail related to this proceeding may be sent to:

Douglas F. Brent
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400 West Market Street
Louisville, Kentucky 40202

For the reasons stated above, NewSouth asks that this Motion for Full Intervention be granted.

Respectfully submitted,

By: /s/

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