

OCT 1 0 2003

PUBLIC SERVICE COMMISSION

October 9, 2003

2500 Brown & Williamson Tower

Louisville, Kentucky 40202

502.584.1135

502.561.0442 fax

www.middreut.com

Douglas F. Brent

Direct dial: 502-625-2771

dbrent@middreut.com

Mr. Thomas M. Dorman Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40601

RE: Case No. 2003-00379

Dear Mr. Dorman:

Enclosed please find the original and ten copies of AT&T Communications of the South Central States, LLC ("AT&T") Motion for Full Intervention. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Sincerely Yours,

Douglas F. Brent

Counsel to AT&T Communications of the South Central States, LLC

DFB:jms

Enc.

Cc: Parties of Record



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)

AT&T'S 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, AT&T Communications of the South Central States, LLC ("AT&T") submits this motion for full intervention in the above-captioned proceeding.

AT&T is a utility authorized to provide competitive local and long-distance services in Kentucky. As a competitive local carrier ("CLEC"), AT&T has a direct interest in the Section 251 unbundling obligations of incumbent local exchange carriers, and intends to participate in this matter. AT&T's participation is likely to present issues that will assist the Commission without unduly complicating the proceeding.

A copy of this motion is being sent to the Attorney General and to the incumbent local exchange carriers identified in paragraph four of the Commission's Order. Any future pleadings will be served upon parties or as the Commission may otherwise direct.

AT&T requests that all pleadings and other documents be served upon:

C. Kent Hatfield Douglas F. Brent Middleton Reutlinger 2500 Brown & Williamson Tower Louisville, KY 40202

and

Martha M. Ross-Bain Senior Attorney AT&T Communications Suite 8100 1200 Peachtree Street, N.E. Atlanta, GA 30309

For the reasons shown above, AT&T asks that this Motion for Full Intervention be granted.

Respectfully submitted,

By:

C. Kent Hatfield
Douglas F. Brent
MIDDLETON REUTLINGER
2500 Brown & Williamson Tower
Louisville, KY 40202
(502) 584-1135

Counsel for AT&T Communications of the South Central States, LLC

CERTIFICATE OF SERVICE

This is to certify that I have this 9th day of October, 2003 caused to be served by United States mail a copy of the within and foregoing Motion to Intervene upon the following persons, properly addressed as follows:

Douglas F. Brent

Stephen R. Byars Vice President – External Affairs ALLTL Communications, Inc P.O. Box 1650 Lexington, Kentucky 40588-1650

Dorothy Chambers Regulatory & External Affairs BellSouth Telecommunications, Inc. 601 West Chestnut Street, Room 410 P.O. Box 32410 Louisville, Kentucky 40232 Hon. Ann Louise Cheverout Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40601-8204

Jouett Kinney Cincinnati Bell 201 East 4th Street Building 103-1610 Cincinnati, Ohio 45201