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J.D./M.B.A.
LICENSED IN KENTUCKY, OHIO AND COLORADO

December 29, 2004

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

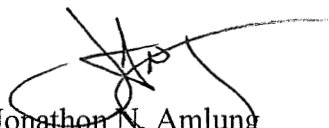
***RE: Petition of BellSouth Telecommunications, Inc., for the Establishment
of a New Performance Plan, Case No. 2004-00391***

Dear Ms. O'Donnell:

Please find enclosed for filing an original and ten (10) copies of SouthEast Telephone's Motion to Intervene, for filing in the above-referenced case.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions or concerns.

Cordially yours,


Jonathon N. Amlung

Enclosures

cc: Parties of Record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

PETITION OF BELLSOUTH TELECOMMUNICATIONS,) CASE NO.
INC. FOR THE ESTABLISHMENT OF A NEW) 2004-00391
PERFORMANCE PLAN

MOTION FOR LEAVE TO INTERVENE

Comes now SouthEast Telephone, Inc. ("SouthEast"), by and through counsel, and hereby Petitions this Honorable Commission pursuant to 807 KAR 5:001, Section 3, for an Order permitting it to Intervene as a party in this case. In support of this Petition, SouthEast states as follows:

1. On August 31, 2004, BellSouth Telecommunications, Inc. ("BellSouth"), filed its Petition for a new performance assessment plan in Kentucky. As part of its Petition, BellSouth requested this Commission to "adopt a new performance assessment plan that effectively ensures BellSouth's performance is at a satisfactory and nondiscriminatory level and that establishes penalties rationally related to the level of BellSouth's performance."

2. SouthEast Telephone, Inc. ("SouthEast"), is a competitive local exchange carrier ("CLEC"), with its principle place of business located in Pikeville, Kentucky. SouthEast provides telecommunications services within parts of BellSouth's territories in Kentucky, thus dealing with BellSouth directly on a daily basis. This case involves issues relevant to SouthEast's business.

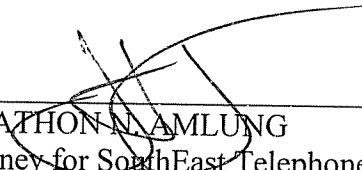
3. SouthEast provides services to thousands of rural customers in Kentucky, giving it a unique position and perspective. Should SouthEast be permitted full

intervention, it will be able to help develop facts that will assist the Commission in full consideration of this matter. Should this Commission permit SouthEast to intervene in this case, SouthEast will comply with the existing docketing schedule, so as to not unduly burden the Commission, the staff attorneys or the parties in this case. SouthEast previously filed a letter in this case notifying the Commission of its opposition to BellSouth's performance plan in this matter, but the letter was described on the docket as stating that SouthEast will not be filing recommendations in this docket. SouthEast does wish to participate actively in this case.

4. SouthEast requests that it be granted leave for full intervention with the right to fully participate in this proceeding as a party, and that the undersigned counsel for SouthEast be served with filed testimony, exhibits, pleadings, correspondence and all other documents submitted by parties and be certified as a party for the purposes of receiving service of any petition for rehearing or judicial review.

WHEREFORE, in recognition of the foregoing, SouthEast respectfully requests that the Commission permit SouthEast to intervene fully as a party of record in this proceeding.

Respectfully submitted,



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CERTIFICATION

I hereby certify that a true and correct copy of the foregoing was mailed, this the 30th day of December, 2004, to:

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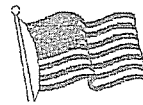
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