

S T O L L

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DOUGLAS F. BRENT
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DEC 02 2004

December 1, 2004

PUBLIC SERVICE
COMMISSION

Ms. Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40602

RE: 2004-00391

Dear Ms. O'Donnell:

Enclosed please find an original and ten copies of DIECA Communications, Inc. d/b/a Covad Communications Company's Petition for 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

DFB:jms

Enc.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF BELLSOUTH)
TELECOMMUNICATIONS, INC. FOR THE)
ESTABLISHMENT OF A NEW PERFORMANCE)
PLAN)

CASE NO. PUBLIC SERVICE
2004-00391 COMMISSION

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COVAD'S PETITION FOR INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8) and the Order issued November 10, 2004, in the above-captioned proceeding, DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad") submits this petition for full intervention in the above-captioned proceeding.

Covad interconnects with BellSouth and thus has a direct and special interest which is not otherwise adequately represented in the proceeding. Participation by Covad is likely to present issues that will assist the Commission without unduly complicating the proceedings.

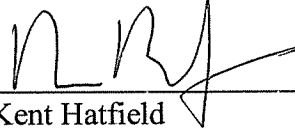
Petitioner requests that all pleadings and other documents be served upon:

Charles E. Watkins
Covad Communications
1230 Peachtree Street, 19th Floor
Atlanta, Georgia 30309
(404) 942-3492

C. Kent Hatfield
Douglas F. Brent
Stoll, Keenon & Park, LLP
2650 AEGON Center
400 West Market Street
Louisville, Kentucky 40202
(502) 568-9100

For these reasons, Covad asks that this Motion for Full Intervention be granted.

Respectfully submitted,



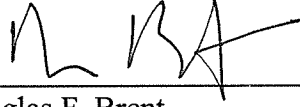
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400 West Market Street
Louisville, Kentucky 40202
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ATTORNEYS FOR COVAD COMMUNICATIONS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Covad's Petition for Intervention has been furnished by (*) electronic mail and U.S. Mail this 1st day of December, 2004 to the following:

A handwritten signature in black ink, appearing to read 'D. Brent', is written above a horizontal line.

Douglas F. Brent

Dorothy J. Chambers, Esquire
BellSouth Telecommunications, Inc.
601 West Chestnut Street, Room 407
Louisville, Kentucky 40203



First Class Mail

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PUBLIC SERVICE
COMMISSION

FROM

STOLL, KEENON & PARK, LLP
ATTORNEYS AT LAW
2650 AEGON CENTER • 400 WEST MARKET STREET
LOUISVILLE, KENTUCKY 40202-3377

TO

Ms. Elizabeth O'Donnell
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602