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June 3, 2005

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JUN 03 2005

PUBLIC SERVICE
COMMISSION

Ms. Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602-0615

Re: Case No. 2004-00427 – Petition of Sprint Communications Company, L.P. for
Leave to Intervene

Dear Beth:

Enclosed for filing in the above-referenced case are the original and ten copies of the
Petition of Sprint Communications Company, L.P. for Leave to Intervene. Both counsel for
Sprint are capable of electronic receipt of pleadings and orders, which should be directed to:

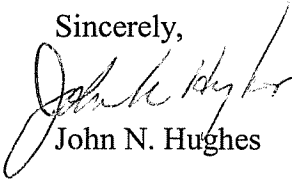
Edward Phillips
Sprint Communications Company, L.P.
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Wake Forest, North Carolina 27587-5900
(919) 554-7870 (T)
(919) 554-7913 (F)
Edward.Phillips@mail.sprint.com

And

John N. Hughes
124 West Todd Street
Frankfort, Kentucky 40601
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jnhughes@fewpb.net

Thank you for your assistance, and please call me if you should have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John N. Hughes". The signature is written in a cursive style with a large initial "J" and "H".

John N. Hughes

Enclosures

cc: Parties of Record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
Petition of BellSouth Telecommunications, Inc.) Case No. 2004-00427
to Establish Generic Docket to Consider)
Amendments to Interconnection Agreements)
Resulting from Changes of Law)

PETITION OF SPRINT COMMUNICATIONS COMPANY, L.P.
FOR LEAVE TO INTERVENE

Sprint Communications Company, L.P. (“Sprint”), by counsel, pursuant to 807 KAR 5:001, Section 3(8), and petitions the Public Service Commission (“Commission”) for leave to intervene fully in the above-styled proceeding. In support of its Petition, Sprint respectfully shows as follows:

1.

On November 1, 2004, BellSouth Telecommunications, Inc. (“BellSouth”) filed a petition requesting that the Commission establish a generic docket to consider amendments to interconnection agreements resulting from changes of law. On November 9, 2004, BellSouth certified to the Commission that affected Competitive Local Exchange Carriers had been served with the BellSouth petition. Thereafter, on February 28, 2005, Cinergy Communications Corp. filed a Complaint and Motion for an Emergency Order preserving the status quo of the interconnection agreements. On March 10, 2005, the Commission ordered BellSouth to follow its contractual change of

law process set forth in its interconnection agreements. In addition, the Commission took other necessary action in its March 10th Order to move this matter forward.

2.

Sprint is a Competitive Local Exchange provider authorized to do business within the Commonwealth of Kentucky.

3.

Sprint respectfully submits that the above-referenced case may have a direct and material effect upon Sprint's legal rights, duties, privileges, immunities or other legal interests. Sprint has a substantial and special interest in a Commission determination with respect to the issues raised that are not otherwise adequately represented. The Commission's grant of full intervenor status to Sprint is likely to present issues or develop facts that facilitate the Commission's full consideration in this matter without unduly complicating or disrupting the proceedings at this stage. In addition, it is Sprint's understanding that no procedural schedule has been set for this matter. Therefore, Sprint submits that the granting of its intervention will not impair the due process rights of any other participants already a party to this proceeding.


4.

Sprint 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 Sprint 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, Sprint respectfully requests that the Commission allow it to intervene fully as a party of record in this proceeding.

Respectfully submitted this 3rd day of June, 2005.



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-and-

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