

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE INTRASTATE)	ADMINISTRATIVE
SWITCHED ACCESS RATES OF ALL)	CASE NO.
KENTUCKY INCUMBENT AND COMPETITIVE)	2010-00398
LOCAL EXCHANGE CARRIERS)	

MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8)(b), AT&T Communications of the South Central States, LLC (“AT&T Communications”), BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service, and TCG Ohio (collectively “AT&T”), by counsel, hereby move the Public Service Commission of the Commonwealth of Kentucky (the “Commission”) to grant AT&T full intervention in the above-captioned matter.

In establishing this administrative case by Order dated November 5, 2010, the Commission stated that it would examine the intrastate switched access rates charged by Kentucky’s incumbent and competitive carriers to determine if the rates include above-cost implicit subsidies and, if so, whether the subsidies are anti-competitive. The Commission plans to use this proceeding to investigate access charge reform within Kentucky. Among the major issues the Commission expects to consider are whether Kentucky should transition to a cost-based system for access rates; how carriers should be allowed to recover lost revenue; how much time carriers should be given to transition to a new system; what the advantages or disadvantages are of one revenue recovery method over another; whether Kentucky should require CLECs’ intrastate access rates

to mirror the interstate access rates of ILECs; and whether the Commission should establish a goal of ultimately moving to a zero rate for access charges.

In support of its motion to intervene, AT&T states that it is an interexchange carrier ("IXC") and/or competitive local exchange carrier ("CLEC") that provides local, long distance, and/or access services within the Commonwealth of Kentucky. As such, AT&T pays, and in the case of its CLEC entity also charges, intrastate switched access rates for the origination and termination of long distance calls. Because any ruling by the Commission in this case regarding intrastate switched access rates thus will have a direct impact on AT&T and its customers, AT&T has a special interest in the case not otherwise adequately represented by any other party.

It is appropriate, therefore, that AT&T Communications, AT&T Long Distance Service, and TCG Ohio be made parties to the case and be served with all testimony, pleadings, correspondence and all other documents submitted by parties on the undersigned counsel for AT&T.

For the foregoing reasons, AT&T respectfully requests that the Kentucky Public Service Commission grant this motion for full intervention in this case.

Respectfully submitted,



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