

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

VERIZON’S MOTION FOR INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8), MCImetro Transmission Access Transmission Services LLC d/b/a Verizon Access Transmission Services (“Verizon Access”), MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc., Teleconnect Long Distance Service & Systems d/b/a Telecom*USA and Verizon Select Services, Inc. (collectively, “Verizon”) submit this motion for intervention in the above-captioned proceeding.

The Commission initiated this administrative case in order to examine the intrastate switched access rates of Kentucky incumbent local exchange carriers (“ILECs”) and competitive local exchange carriers (“CLECs”). Verizon Access operates as a CLEC in Kentucky. In addition, Verizon is a long distance carrier (sometimes known as an interexchange carrier or “IXC”) and, in that capacity, purchases intrastate switched access services from a number of different Kentucky ILECs and CLECs. As both an intrastate switched access provider and ratepayer, Verizon has a direct interest in any examination of intrastate switched access rate levels that will occur in this proceeding. Moreover, as a result of its experience as a ratepayer in this and other states and having recently been involved in a complaint proceeding before the

Commission regarding a Kentucky ILEC's intrastate switched access rates,¹ Verizon is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating the proceedings. No other entity adequately can represent Verizon's direct interest in this case. Thus, Verizon's interests in this proceeding satisfy the requirements of the Commission's regulation for intervention. *See* 807 KAR 5:001, Section 3(8).

For the reasons stated above, Verizon asks that this Motion for Intervention be granted. Filings, notices and other papers may be served on undersigned counsel for Verizon.



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and Verizon Select Services, Inc.

¹ *See* Case No. 2007-00503, *MCI Communications Services, et al. v. Windstream Kentucky West, Inc., et al.*

CERTIFICATE OF SERVICE

I hereby certify that the electronic version of this filing made with the Commission on December 3, 2010, is a true and accurate copy of the document filed herewith in paper form, and the electronic version of the filing has been transmitted to the Commission.

A handwritten signature in black ink, appearing to read "Douglas F. Brent", with a long horizontal stroke extending to the right.

Douglas F. Brent