

**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 OF SPRINT NEXTEL FOR FULL INTERVENTION**

Sprint Communications Company L.P. (“Sprint”); Sprint Spectrum, L.P. and SprintCom, Inc. d/b/a Sprint PCS (“Sprint PCS”); Nextel West Corp., Inc. (“Nextel”); and NPCR, Inc., d/b/a Nextel Partners (“Nextel Partners”) (collectively, “Sprint Nextel”) pursuant to 807 KAR 5:001, Section 3(8), by counsel, move that the Public Service Commission (“Commission” or “KPSC”) permit Sprint Nextel to intervene fully in the above-styled proceeding. In support of its Motion, Sprint Nextel shows as follows:

1.

On November 5, 2010, the Commission issued its Order establishing this matter to “examine the switched access rates of Kentucky incumbent and competitive carriers”. In its Order, the Commission stated that it “has a duty to investigate and address the basis and structure for intrastate access rates and how they are affecting Kentucky’s telephone market.” The KPSC further specified that the focus of its investigation would be “to determine if the switched access rates of Kentucky telecommunications carriers include above-cost implicit subsidies”, and if so, whether “they qualify as anti-competitive”. The Commission also stated that it would determine “whether it should develop a regulatory

scheme that firmly establishes a methodology for charging intrastate switched access rates”.

2.

Sprint is an authorized competitive local exchange carrier (“CLEC”), and is providing telecommunications services, including switched access services, within the Commonwealth of Kentucky. Sprint is also a duly authorized interexchange carrier (“IXC”) that provides telecommunications services in the Commonwealth.

3.

Sprint PCS, Nextel and Nextel Partners are authorized to provide CMRS services in Kentucky. Sprint PCS, Nextel and Nextel Partners all pay intrastate switched access charges to local exchange carriers operating in the Commonwealth.

4.

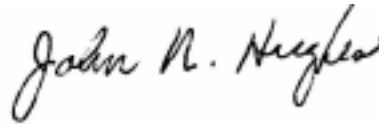
The Commission’s determinations in this proceeding may have a direct and material effect upon Sprint Nextel’s legal rights, duties, privileges, immunities or other legal interests. Sprint Nextel has a substantial and special interest in a Commission determination with respect to the issues raised that is not otherwise adequately represented. Sprint Nextel’s participation in this proceeding is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the case.

5.

Sprint Nextel moves that it be granted full intervention in this matter with the right to fully participate in this proceeding as a party and that counsel for Sprint Nextel 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 Nextel moves that the Commission allow it to intervene fully as a party of record in this proceeding.

Submitted this 16<sup>th</sup> day of November, 2010.



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