## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

An Investigation into the Intrastate Switched Access Rates of All Kentucky Incumbent and Competitive Local Exchange Carriers

Adm. Case No. 2010-00398

## Motion for Full Intervention by Level 3 Communications, LLC

Level 3 Communications, LLC ("Level 3") respectfully moves for full intervention in the above-referenced proceeding pursuant to KRS 278.310 and 807 KAR 5:001, §3(8):

1. Level 3 is a competitive local exchange carrier (class A, Utility ID 5009400) and a long distance carrier (class D, Utility ID 22250094) in the Commonwealth of Kentucky.

2. Level 3 has on file with the Commission an access tariff (currently, Kentucky

P.S.C. Tariff No. 3, as revised), and furnishes switched access services within Kentucky.

3. The Commission noted at page 7 of the 11/5/10 Order initiating this proceeding that the effect of this proceeding will be unique to each individual CLEC, but that all CLECs "will be obligated to adhere to the final decisions of the Commission as to the access rate structure and collection methodologies rendered in this proceeding." Therefore, Level 3 "has a special interest in the proceeding which is not otherwise adequately represented," and should be granted full intervention. 807 KAR 5:001, Section 3(8)(b).

4. Level 3 asks that Commission Orders and filings made or documents submitted by parties be served on:

greg.diamond@level3.com

Greg T. Diamond Corporate Counsel - Regulatory LEVEL 3 COMMUNICATIONS, LLC 1025 Eldorado Boulevard Broomfield, CO 80021 yunker@desuetude.com

Katherine K. Yunker YUNKER & PARK PLC P.O. Box 21784 Lexington, KY 40522-1784

WHEREFORE, Level 3 respectfully requests full intervention in this proceeding.

Respectfully submitted,

s/d Katherine K. Yunker yunker@desuetude.com YUNKER & PARK PLC P.O. Box 21784 Lexington, KY 40522-1784 Phone: 859-255-0629 Fax: 859-255-0746

Attorney for Level 3 Communications, LLC