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Honorable Lisa K. Nally-Martin Marion County Attorney 104 West Main Street, Box 678 Lebanon, KY 40033

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GARRARD COUNTY JUDGE EXECUTIVE 15 Public Square Lancaster, KY 40444 (859)792-3531

FILING NOTICE AND CERTIFICATE

I hereby certify that an original and ten (10) copies of this Response were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served on the following by mailing a copy first class U.S. Mail Delivery postage prepaid, on 18 day of September, 2015:

J. Tyson Covey Dennis G. Friedman Mayer Brown LLP 71 South Wacker Drive Chicago, IL 60606 Attorneys for BellSouth Telecommunications, Inc.

Robert C. Moore Attorney at Law Hazelrigg & Cos, LLP <u>-415-West-Main-Street</u> P.O. Box 676 Frankfort, Ky 40602 Attorneys for BellSouth Telecommunications, Inc.

Honorable David J. Barberie Honorable Melissa M. Murphy Honorable Janet M. Graham LFUCG, Department of Law 200 East Main Street Lexington, KY 40507 Attorneys for LFUCG, Division of E911

BellSouth Telecommunications, LLC d/b/a AT&T 601 West Chestnut Street, 4th Floor East Louisville, KY 40203

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BELLSOUTH TELECOMMUNICATIONS, LLC FOR DECLARATORY ORDER REGARDING INTERCONNECTION WITH CENTRAL KENTUCKY NETWORK FOR 911/E911 SERVICES TO PUBLIC SAFETY ANSWERING POINTS

CASE NO. 2015-00227

GARRARD COUNTY FISCAL COURT'S RESPONSE TO VERIFIED PETITION FOR DECLARATORY ORDER

Comes Garrard County Fiscal Court, Garrard County, Kentucky ("GCFC"), and pursuant to 807 KAR 5:001 Section 3(8), and files the following as its response to BellSouth Telecommunications, Inc.'s, d/b/a AT&T Kentucky ("AT&T Kentucky"), Verified Petition for Declaratory Order. To the extent appropriate and necessary this response shall also serve as a supplemental response of the Central Kentucky 9-1-1 Network (the "Network")

Network (the "Network").

GCFC respectfully requests that this matter be dismissed as the Public Service Commission lacks jurisdiction over the Network. Alternatively, GCFC requests that the relief requested in this matter be denied in its entirety. Finally, in the event that the Public Service Commission finds that the Network is a regulated utility, GCFC reserves the right to join in a request for further relief pursuant to KRS 278.51(2).