## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BELL SOUTH	)	
TELECOMMUNICATIONS, LLC FOR	)	CASE NO
DECLARATORY ORDER REGARDING	)	2015-00227
INTERCONNECTION WITH CENTRAL	)	
KENTUCKY NETWORK FOR 911/E911	)	
SERVICES TO PUBLIC SAFETY	)	
ANSWERING POINTS	)	
ANSWERING POINTS	)	

## JESSAMINE COUNTY FISCAL COURT'S MOTION TO INTERVENE

Comes Jessamine County Fiscal Court, Jessamine County, Kentucky ("JCFC"), by counsel, and pursuant to 807 KAR 5:001 Section 3(8), and moves that it be granted leave to intervene in this matter and that it be granted full intervention status. Approval of the application in this matter will have a significant impact on JCFC as it is the local government primarily responsible for the administration and maintenance of E-911 services which participates in the Central Kentucky 9-1-1 Network pursuant to the agreements under which the network was created and operates and it uses the network to provide services to the citizens of Jessamine County. To the extent appropriate and necessary, JCFC also moves to intervene on behalf of the Central Kentucky 9-1-1 Network.

JCFC has a special interest in this matter, and it will not be adequately represented by the other parties. JCFC's participation in this matter is also likely to assist the Commission in developing and identifying facts and issues and in

fully considering this matter without unduly complicating or disrupting the proceeding.

Respectfully Submitted,

BRIAN T. GÖETTL

JESSAMINE COUNTY ATTORNEY

117 South Main Street, Suite 100

Nicholasville, KY 40356

859-885-3425

## FILING NOTICE AND CERTIFICATE

I hereby certify that an original and ten (10) copies of this Motion to Intervene 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 by first class U.S. Mail delivery postage prepaid, on 940 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 & Cox, LLP
415 West Main Street
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, 4<sup>th</sup> Floor East Louisville, KY 40203

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

Honorable William Fogle
Office of Homeland Security
Commonwealth of Kentucky
200 Mero Street
Frankfort, KY 40601
Attorney to CMRS Board

John E. Selent, Esq.
Edward T. Depp, Esq.
Dinsmore & Shohl, LLP
101 South Fifth Street, Suite 2500
Louisville, KY 40202
Attorneys to KIT-COM

Larry G. Bryson, Esq. 318 West Dixie Street London, KY 40741 Attorney for London Laurel County Communication Center

Honorable Angela Goad Assistant Attorney General Commonwealth of Kentucky 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601

BRIAN T. GOETTL