

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

CINCINNATI BELL TELEPHONE CO. MOTION TO INTERVENE

Cincinnati Bell Telephone Company LLC (“CBT”), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the “Commission”), for leave to file its motion out of time, and pursuant to 807 KAR 5:001 Section 4(11), moves that it be granted leave to intervene in this matter and that it be granted full intervention status.

As an ILEC, CBT has interconnections with various PSAPs for the purpose of routing 911 traffic. The resolution of the issues raised in the Petition in this matter could impact CBT’s provision of service and its duty to ensure reliability and safety of 911 services in communities throughout the Commonwealth. CBT’s interests will not be fully and adequately represented unless it is granted leave to intervene in this matter, and permitting CBT to fully intervene will not unduly complicate or disrupt the proceedings.

WHEREFORE, CBT respectfully requests that the Commission excuse its filing out of time and that the Commission grant its motion for a full intervention in this proceeding.

Respectfully submitted,



PATRICK M. CROTTY  
COUNSEL – CINCINNATI BELL TELEPHONE CO. LLC  
221 EAST FOURTH STREET, SUITE 1090  
CINCINNATI, OHIO 45202  
PHONE: (513) 397-0750  
FAX: (513) 397-9557

**CERTIFICATE OF SERVICE AND FILING**

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing was transmitted to the Commission on September 3, 2015; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 3rd day of September, 2015.



\_\_\_\_\_  
PATRICK M. CROTTY  
COUNSEL – CINCINNATI BELL TELEPHONE CO. LLC