

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**LONDON-LAUREL COUNTY COMMUNICATION  
CENTER'S MOTION TO INTERVENE**

COMES the London-Laurel County Communications Center ("Center"), 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. In support of its motion, the Center states as follows:

1. The full name and address of the Center is the London-Laurel County Communications Center, 503 South Main Street, London, KY 40541.
2. The Center is local government entity which, pursuant to agreements with the Central Kentucky 9-1-1 Network, uses the Central Kentucky 9-1-1 Network, to provide 911 and E911 services to the citizens of London and Laurel County.
3. BellSouth Telecommunications, LLC d/b/a AT&T Kentucky ("AT&T Kentucky") has filed a petition (the "Petition") with the Commission seeking a declaratory order to determine the obligations of AT&T Kentucky and Central Kentucky 911 Network ("CKN") regarding interconnection and routing of traffic for the provision of 911 service to Public Safety Answering Points ("PSAP").

4. In its order of July 31, 2015, the Commission ordered that all entities who wish to become parties to this proceeding shall file motions to intervene "no later than August 26, 2015."
5. In its order of August 26, 2015, the Commission ordered that "paragraph 2 of the July 31, 2015 Order is amended to read as follows: Responses to the petition for declaratory order, if any, shall be filed no later than September 11, 2015."
6. In its order of July 31, 2015, the Commission also emphasized that AT&T Kentucky requests Commission action that "could have statewide implications for 911 services."
7. AT&T specifically referenced the Center multiple times in the Petition.
8. Approval of the application in this matter will have a significant impact on Center as uses the Central Kentucky 9-1-1 Network to provide 911 and E911 services to the citizens of London and Laurel County.
9. The Center has a special interest in this matter, and it will not be adequately represented by the other parties.
10. Center'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 proceedings.

WHEREFORE, the Center respectfully requests that the Commission grant its motion for a full intervention in this proceeding

Respectfully submitted,



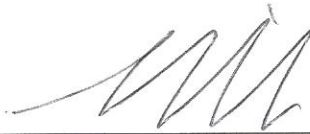
Linda K. Ain  
The Law Firm of Linda K. Ain  
4725 Inman Drive  
Lexington, KY 40513  
859-224-3035  
lindaain@twc.com

Larry G. Bryson  
Bryson Law Office  
318 W. Dixie Street  
London, Kentucky 40741  
606-878-7123  
lgbryson@windstream.net

Counsel to the London-Laurel County Communications Center

**FILING NOTICE AND CERTIFICATE**

I hereby certify that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission (which includes a cover letter serving as the required Read1st document) within two business days; that the electronic filing was transmitted to the Commission on September 8, 2015; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



---

Linda K. Ain  
Counsel to the London-Laurel County  
Communications Center