

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  
RESPONSE TO VERIFIED PETITION FOR DECLARATORY ORDER**

COMES the London-Laurel County Communications Center ("Center"), by counsel and pursuant to 807 KAR 5:001 Section 19(4), and files the following as its response to BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky")'s Verified Petition for Declaratory Order.

The Center respectfully requests that this matter be dismissed as the Public Service Commission lacks jurisdiction over the Central Kentucky 9-1-1 Network (the "Network"). Alternatively, Center requests that the relief requested in this matter be denied in its entirety.

1. The Center is local government entity which, pursuant to agreements with the Network, uses the Network for 911 and E911 call answering for the citizens of London and Laurel County.

4. The Network supports the Center's dispatch centers; however, it is not a telecommunications carrier.

5. The creation of the Network was and is supported by the Kentucky Commercial Mobile Radio Service Board ("CMRS") through the provision of grants for the purchase of equipment for its participants.

6. The common link for the provision of services through the Network is a Selective Router. The Network otherwise uses the services and equipment of various telecommunications providers or its members dispatch centers.

7. The Network's Selective Router is located in a collocation facility owned by Windstream Telecommunications (or an affiliate) and is protected by security measures and redundant electricity, generators, cooling systems, and a battery backup. A similarly secured backup Selective Router is located on Lexington-Fayette Urban County Government -owned property.

8. The Network distributes incoming calls from the Center and other Network's participating members and operates on a per seat basis.

9. Each member of the Network, including the Center, pays a proportional share of the operating and maintenance expenses of the Network based upon its number of seats.

10. Most or all of the services provided through the Network are internet-based and are not subject to regulation pursuant to KRS 278.5462(1).

11. The Network is not a utility pursuant to applicable law, and is therefore not subject to regulation by the Public Service Commission.

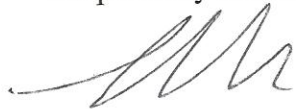
12. The Network is not a telecommunications carrier and is not providing telecommunications service or telephone exchange service under federal law.

13. The Center did not randomly "disconnect its PSAP equipment from the 911 services provided by [ATT]," as alleged by AT&T in paragraph 9 of the Petition, but rather the Center requested that AT&T send its end-users' 911 call to the Network because the Center's servers failed.

14. AT&T has refused or not cooperated with the expressed desire of and specific request of the Center to have the 9-1-1 calls in their jurisdiction delivered to the Network for routing. The delay, confusion and uncertainty associated with the position taken by AT&T creates a danger to public safety and impedes 9-1-1 services.

15. The Center has made multiple reasonable requests for the Petitioner to provide the data and assistance necessary in order for the Network to provide seamless 911/E911 services to all of the Petitioner's impacted customers but that to date the Petitioner is unwilling to do so unless the demands made in its Petition are met.

Respectfully submitted,



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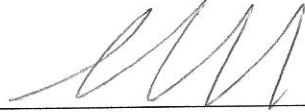
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**FILING NOTICE AND CERTIFICATE**

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.

A handwritten signature in black ink, appearing to read 'LKA', is written above a horizontal line.

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