

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 )

**THE ATTORNEY GENERAL’S RESPONSE TO BELLSOUTH  
TELECOMMUNICATIONS, LLC. d/b/a AT&T KENTUCKY’S  
VERIFIED PETITION FOR DECLARATORY ORDER**

Comes the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (hereinafter the “Attorney General”), by counsel, and pursuant to 807 KAR 5:001 Section 19(4), and files his response to BellSouth Telecommunications, LLC d/b/a AT&T Kentucky’s (“AT&T Kentucky”) Verified Petition for Declaratory Order.

1. The Attorney General is without knowledge or information sufficient to form a belief as to the truth of the averments contained in the introductory paragraph and in numerical paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 and 19.
2. Any averments in the Verified Petition for Declaratory Order not addressed above are hereby DENIED.

Wherefore, the Attorney General reserves his right as an intervenor in this proceeding to fully participate in the case, including but not limited to any potential informal conference or hearing which may be scheduled by the Public Service Commission.

Respectfully submitted,

JACK CONWAY  
ATTORNEY GENERAL



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### **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 August 26, 2015; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

this 26th day of August, 2015.

  
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Assistant Attorney General