

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COMPETITIVE CARRIERS )	
OF THE SOUTH, INC., FOR A DECLARATORY )	
ORDER AFFIRMING THAT THE )	CASE NO.
INTERCONNECTION REGIMES UNDER )	2015-00283
KRS 278.530 AND 47 U.S.C. § 251 ARE )	
TECHNOLOGY NEUTRAL )	

**AT&T KENTUCKY’S MOTION TO INTERVENE**

In compliance with the October 5, 2015 deadline the Commission established in its Order entered August 26, 2015, AT&T Kentucky,<sup>1</sup> by counsel and pursuant to 807 KAR 5:001 Section 4(11), requests leave to intervene in this matter and to participate with full intervention status. AT&T Kentucky is a “telephone company” as that term is used in KRS §278.530, and it is a “telecommunications carrier,” a “local exchange carrier,” and an “incumbent local exchange carrier” as those terms are used in 47 U.S.C. §§251-252. As such, AT&T Kentucky has an interest in the subject matter of CompSouth’s Application for a Declaratory Order that is not otherwise adequately represented, and its participation in this proceeding will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings. If the Commission grants this Motion, all parties should serve AT&T Kentucky through the undersigned counsel at the mailing address and/or electronic mail address set forth below.

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<sup>1</sup> BellSouth Telecommunications, LLC d/b/a AT&T Kentucky

Respectfully submitted,

/s/ Robert C. Moore

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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 Read 1<sup>st</sup> document) within two business days; that the electronic filing was transmitted to the Commission on October 12, 2015; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Robert C. Moore