

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

The Application of Competitive Carriers of the)	
South, Inc. for a Declaratory Order Affirming that)	
The Interconnection Regimes under KRS 278.530)	Case No. 2015-00283
and 47 U.S.C. § 251 are Technology Neutral)	

MOTION TO INTERVENE OF CINCINNATI BELL TELEPHONE COMPANY LLC

Cincinnati Bell Telephone Company LLC (“CBT”) respectfully requests that the Commission grant it full intervention in this proceeding pursuant to 807 KAR 5:001, Section 4(11). The Commission’s August 2, 2015 Order required CompSouth to serve its Petition on all ILECs in Kentucky and afforded the opportunity to intervene and respond in this proceeding by October 5, 2012. That deadline was extended to October 12, 2015 in an Order entered on September 24, 2015.

CBT is an ILEC operating in Kentucky and would be directly affected by any ruling declaring the rights of carriers using IP format to interconnect with its network. CBT’s interests will not be fully and adequately represented unless it is granted leave to intervene in this matter. Permitting CBT to intervene will allow it to present issues and to develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

Respectfully submitted,

/s/ Douglas E. Hart
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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 October 12, 2015, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 12th day of October, 2015

/s/ Douglas E. Hart _____
Douglas E. Hart
Attorney for Cincinnati Bell
Telephone Company LLC