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AUG 26 2015

PUBLIC SERVICE
COMMISSION

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August 26, 2015

Via Hand Delivery

Hon. Jeff Derouen, Executive Director
Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

Re: *In the Matter of Application of Bellsouth Telecommunications, LLC for Declaratory Order Regarding Interconnection with Central Kentucky Network for 911/E911 Services to Public Safety Answering Points, Case No. 2015-00227*

Dear Mr. Derouen:

We are legal counsel to Kit-Com, Inc. ("Kit-Com")¹. In that capacity, enclosed please find one (1) original and eleven (11) copies of Kit-Com's motion to intervene for filing in the above matter.

Please file-stamp the additional copy and return it to our courier.

Thank you, and if you have any questions with regard to this matter, please call me.

Sincerely yours,

DINSMORE & SHOHL LLP

Edward T. Depp

ETD/kwi
Enclosures

¹ Kit-Com's members are Ballard Rural Telephone Cooperative Corporation, Inc., Brandenburg Telephone Company, Duo County Telephone Cooperative Corporation, Inc., Foothills Rural Telephone Cooperative, Inc., Gearhart Communications Co., Inc., Highland Telephone Cooperative, Inc., Logan Telephone Cooperative, Inc., Mountain Rural Telephone Cooperative, Inc., North Central Telephone Cooperative Corporation, Peoples Rural Telephone Cooperative, Inc., South Central Rural Telephone Cooperative Corporation, Inc., Thacker-Grigsby Telephone Company, Inc., and West Kentucky Rural Telephone Cooperative Corporation, Inc. (collectively the "RLECs").

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

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

MOTION FOR FULL INTERVENTION

KIT-COM, Inc. ("KIT-COM"), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), pursuant to 807 KAR 5:001 Section 4(11), for full intervention in the above-captioned matter. In support of its motion, KIT-COM states as follows.

1. The full name and address of KIT-COM is KIT-COM, INC., P.O. Box 159, McKee, KY 40447.

2. For purposes of this motion to intervene, and in order to satisfy 807 KAR 5:001 Section 4(11)(a)(1), KIT-COM's electronic mail addresses are as follows: (1) john.selent@dinsmore.com and (2) tip.depp@dinsmore.com.

3. KIT-COM is a trade organization representing the interests of its thirteen (13) members, who are rural incumbent local exchange carriers ("RLECs"), as defined in Section 153(44) of the Telecommunications Act of 1996 (the "Act").

4. The thirteen (13) members of KIT-COM are as follows:

- Ballard Rural Telephone Cooperative Corporation, Inc.
- Brandenburg Telephone Company, Inc.
- Duo County Telephone Cooperative Corporation, Inc.
- Foothills Rural Telephone Cooperative Corporation, Inc.

- Gearheart Communications Company, Inc.
- Highland Telephone Cooperative, Inc.
- Logan Telephone Cooperative, Inc.
- Mountain Rural Telephone Cooperative Corporation, Inc.
- North Central Telephone Cooperative Corporation
- Peoples Rural Telephone Cooperative Corporation, Inc.
- South Central Rural Telephone Cooperative Corporation, Inc.
- Thacker-Grigsby Telephone Company, Inc.
- West Kentucky Rural Telephone Cooperative Corporation, Inc.

5. 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").

6. 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." *Id.* at 2.

7. The Commission also emphasized that AT&T Kentucky requests Commission action that "could have statewide implications for 911 services." *Id.* Accordingly, the Commission ordered AT&T Kentucky to serve a copy of the Petition on the Kentucky Commercial Radio Service ("CMRS") Board and all incumbent local exchange carriers in Kentucky. *Id.*

8. As RLECs, the members of KIT-COM have interconnections with various PSAPs for the purpose of routing 911 traffic. Moreover, the RLECs status as rural carriers under the Act, along with the unique considerations of providing service to the most rural areas of the Commonwealth, gives each member of KIT-COM a special interest in this proceeding, as well as any regulatory safeguards that may be imposed to ensure the reliability and safety of 911 services in their communities.

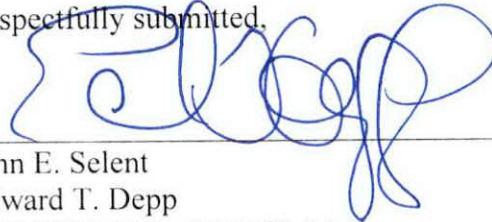
9. Additionally, as rural incumbent local exchange carriers, members of KIT-COM have unique considerations as recognized under the Act and thus will be able to present issues and to develop facts that will assist the Commission in fully considering the effects of the Petition and the potential ramifications of any contemplated action by the Commission.

10. KIT-COM's and its RLEC members' interests will not otherwise be fully and adequately represented.

11. If KIT-COM is permitted to fully intervene in this matter, its intervention will not unduly complicate or disrupt the proceedings.

WHEREFORE, KIT-COM respectfully requests that the Commission grant its motion for a full intervention in this proceeding.

Respectfully submitted,



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Counsel to KIT-COM

CERTIFICATE OF SERVICE

I hereby certify that a copy of the following motion to intervene was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, on August 26th, 2015:

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