COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SEP 112015

RECEIVED

PUBLIC SERVICE COMMISSION

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APPLICATION OF BELLSOUTH TELECOMMUNICATIONS. LLC FOR DECLARATORY ORDER REGARDING)	CASE NO. 2015-00227
INTERCONNECTION WITH CENTRAL KENTUCKY NETWORK FOR 911/E911)	
SERVICES TO PUBLIC SAFETY)	
ANSWERING POINTS)	

GARRARD COUNTY, KENTUCKY'S MOTION TO INTERVENE

Comes Garrard County, Kentucky ("Garrard County"), by counsel, and pursuant to 807 KAR 5:0001 Section 3(8), and moves that it be granted leave to intervene in this matter and that it be granted full intervention status. Approval of the application in this matter will have a significant impact on Garrard County as it is a local government that shares responsibility for the administration and maintenance of the Central Kentucky 9-1-1 Network pursuant to the agreements under which the network was created and operates and uses the network to provide services to the citizens of Garrard County. To the extent appropriate and necessary, Garrard County also moves to intervene on behalf of the Central Kentucky 9-1-1 Network.

Garrard County has a special interest in this matter, and will not be adequately represented by the other parties. Garrard County's participation in this matter is also likely to assist the Commission in developing and identifying facts and issues and in fully considering this matter without unduly complicating or disrupting the proceedings.

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Respectfully submitted,

JOHN WILSON GARRARD COUNTY JUDGE EXECUTIVE 15 Public Square Lancaster, KY 40444 (859) 792-3531

FILING NOTICE AND CERTIFICATE

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen. Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, on September 8, 2015:

BellSouth Telecommunication, LLC d/b/a AT&T 601 W. Chestnut Street 4th Floor East Louisville, KY 40203

J. Tyson Covey and Dennis G. Friedman Mayer Brown LLP 71 South Wacker Drive Chicago, IL 60606

Hon. Robert C. Moore Attorney at Law Hazetrigg & Cox, LLP 415 West Main Street P.O. Box 676 Frankfort, KY 40602 David J. Barberie Melissa M. Murphy Janet M. Graham Attorneys for Lexington- Fayette Urban County Government Department of Law 200 East Main Street Lexington, Kentucky 40507 (859) 258-3500 .

By John Wilson, Attorney at Law V

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