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Melvin J. Malone

TH REGULATOR Direct Dial (615) 744-8572 DOCKE THUMAN COMMITTEE THE PROPERTY OF THE PROPERTY OF

November 29, 2007

## **VIA HAND DELIVERY**

Honorable Eddie Roberson, Chairman c/o Sharla Dillon, Docket & Records Manager Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

E: Petition of Frontier Communications of America, Inc. to Amend Its

Certificate of Convenience and Necessity

**TRA Docket No. 07-00155** 

Dear Chairman Roberson:

Enclosed please find one (1) original and thirteen (13) copies of West Kentucky Rural Telephone Cooperative Corporation Inc.'s Petition for Leave to Intervene. We have also enclosed one (1) copy of the documents to be file stamped for our records. Also enclosed is a check in the amount of \$25.00 for the filing fee. If you have any questions or need additional information, please let me know.

Very truly yours

Melvin.

clw

Enclosures

cc: Guilford F. Thornton, Jr.

H. LaDon Baltimore

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN	RE:
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PETITION OF FRONTIER	)	DOCKET NO. 07-00155
COMMUNICATIONS OF AMERICA,	)	
INC. TO AMEND ITS CERTIFICATE	)	
OF CONVENIENCE AND NECESSITY	)	

## PETITION FOR LEAVE TO INTERVENE OF WEST KENTUCKY RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

West Kentucky Rural Telephone Cooperative Corporation, Inc. ("West Kentucky" or "Petitioner"), by and through its undersigned counsel, hereby seeks leave to intervene in the above-captioned proceeding pursuant to Tenn. Code Ann. § 4-5-310. In support of this petition, Petitioner states as follows:

- 1. Petitioner is a Kentucky telephone cooperative authorized and organized under Kentucky law, specifically KRS §§ 279.300 *et seq.*, to operate and to provide services in the State of Kentucky and maintains its offices at 237 North 8<sup>th</sup> Street, Mayfield, Kentucky 42066.
- 2. Petitioner is also authorized to operate and provide services in the State of Tennessee pursuant to Tenn. Code Ann. § 65-29-128.
- 3. Petitioner provides a full range of telecommunications services in its Kentucky and Tennessee service areas.
- 4. In its Petition, Frontier Communications of America, Inc. ("Frontier") states that it intends to provide service in the service territory of Ben Lomand Rural Telephone Cooperative and then potentially in the service territory of other telephone cooperatives.

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- 5. As Petitioner is a telephone cooperative serving in Tennessee, the subject of this proceeding may directly affect Petitioner's operations in the State of Tennessee.
- 6. Petitioner's legal rights, duties, privileges, immunities or other legal interests may be determined in this proceeding.
- 7. Because of its direct interest in this proceeding, Petitioner respectfully seeks to intervene in this matter.
- 8. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the requested intervention.
- 9. Should the requested intervention be granted, all notices, pleadings, orders, documents and the like in this proceeding should be provided to:

Melvin J. Malone
Mark W. Smith
MILLER & MARTIN, PLLC
150 Fourth Avenue North
1200 One Nashville Place
Nashville, Tennessee 37219-2433
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and

Trevor Bonstetter, General Manager
WEST KENTUCKY RURAL TELEPHONE COOPERATIVE
CORPORATION
237 North 8<sup>th</sup> Street
Mayfield, Kentucky 42066
Tel. (270) 674-1000
Fax (270) 256-3651
tbonn@wk.net

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Based on the foregoing considerations, Petitioner requests the Authority to grant this request for intervention.

Respectfully submitted,

Melvin J. Malone

Mark W. Smith

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Attorneys for West Kentucky Rural Telephone Cooperative Corporation, Inc.

## Certificate of Service

I hereby certify that a true and correct copy has been forwarded via U.S. Mail to the following on this the day of November, 2007.

Guilford F. Thornton, Jr. Charles W. Cook III Adams and Reese LLP 424 Church Street, Suite 2800 Nashville, Tennessee 37215

H. LaDon Baltimore Farrar & Bates, L.L.P. 211 Seventh Avenue North Suite 420 Nashville, Tennessee 37219

Melvin J. Malon