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February 10, 2012

Via Hand Delivery

Terri Lemoine
Records and Recording Division
Louisiana Public Service Commission
Galvez Building – 12th Floor
602 North 5th Street
Baton Rouge, LA 70802

Renee Chabert Crasto
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Re: DOCKET NO.: U-32225
Louisiana Public Service Commission, Ex Parte
In Re: Commission Audit of Lafayette Utility System's Covered Services
Pursuant to General Order dated October 4, 2005. Staff's Audit
Memorandum is being published for review in this docket.
LCTA and members' Comments

Dear Ms. Lemoine:

You will find enclosed an original and two (2) copies of LOUISIANA CABLE & TELECOMMUNICATIONS ASSOCIATION and its member companies (collectively "LCTA")'s Intervention in this docket. Please file the original and necessary copies of record and present to Secretary Gonzalez for future handling as may be appropriate. We also enclose another copy and ask that you file stamp same indicating your receipt and return it to our courier.

If you have any questions or comments, please contact our office.

Thank you for your attention to this request. I remain,

Sincerely yours,

Adams and Reese LLP



Renee C. Crasto

Enclosure

Cc: Service List (w/ enclosure)
Cheryl McCormick, LCTA (w/enclosure)

2012 FEB 10 PM 1:21
L.A. PUBLIC SERVICE
COMMISSION

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

LOUISIANA PUBLIC SERVICE COMMISSION, EX PARTE.

DOCKET No.: U-32225

In Re: Commission Audit of Lafayette Utility System's Covered Services Pursuant to General Order dated October 4, 2005. Staff's Audit Memorandum is being published for review in this docket.

**LOUISIANA CABLE & TELECOMMUNICATIONS ASSOCIATION AND
MEMBER COMPANIES' INTERVENTION**

NOW BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION ("Commission" or "LPSC") appearing through undersigned counsel, come LOUISIANA CABLE & TELECOMMUNICATIONS ASSOCIATION and its member companies (collectively "LCTA"), who, pursuant to *Rule 10* of this Commission's *Rules of Practice and Procedure*, and the Notice published in the Commission's *Official Bulletin No. 1003* (February 3, 2012) timely submits this Intervention to be an intervenor of right in this Docket, therefore entitled to fully participate in all proceedings herein, for the following reasons:

1.

The LPSC initiated the above captioned Docket to review the Commission's Audit of Lafayette Utility System's ("LUS") Covered Services pursuant to LPSC General Order dated October 4, 2005.

2.

LUS is a municipally owned utility providing communication services to retail customers in the City of Lafayette and certain areas of the Parish of Lafayette, Louisiana. LUS's offerings include "covered services" including broadband internet, cable television

and telecommunications services to residents and businesses throughout its service territory pursuant to LPSC General Order dated October 4, 2005 and the Local Government Fair Competition Act.

3.

LCTA is the trade association representing entities, commonly known as cable service providers, who offer and provide vital information, entertainment and similar electronic communications services, including but not limited to broadband internet, cable television and telecommunications services, to subscribers throughout Louisiana. LCTA's members provide broadband internet, cable television, telecommunications services and related services in the same service territory as LUS or in the territories where other municipally owned utilities may be inclined to offer "covered services" in the future. This docket represents the first audit of LUS's activities as required by LPSC General Order dated October 4, 2005 and the Local Government Fair Competition Act. As such, the ability to review and comment on the Commission's Audit of LUS's Covered Services pursuant to General Order dated October 4, 2005 is of vital importance to LCTA.

4.

LCTA's Intervention is timely, within the twenty-five (25) day period traditionally established for most proceedings and in the absence of any period otherwise set forth in the Notice contained in the Commission's *Official Bulletin No. 1003*.

5.

There is no other entity of record in this proceeding whose participation might adequately protect the respective interests of LCTA as expressed herein.

6.

For all of these reasons, LCTA has current and direct concerns in the outcome of this Docket. Therefore, LCTA possesses administratively justiciable and cognizable interests in these proceedings. Further, the audit of "covered services" affects the competitive nature of private non-subsidized telecommunication providers.

7.

LCTA is entitled to right as Intervenor status and to be included on the Official Service List in this Docket. LCTA will be entitled to file comments, offer and cross-examine witnesses, submit data and evidence, and otherwise participate in this proceeding as if it had originated the proceeding and/or to the greatest extent as may be allowed by law, before the Commission and/or any administrative law judge or hearing examiner assigned to this matter.

8.

The contact information for LCTA's legal representatives in this Docket for inclusion on the Official Service List are as follows:

ROBERT L. RIEGER, JR.	Phone: (225) 336-5200
RICHARD B. EASTERLING	Fax: (225) 336-5220
RENEE C. CRASTO	E-mail: Robert.Rieger@arlaw.com
450 Laurel Street, Suite 1900	Richard.Easterling@arlaw.com
Baton Rouge, LA 70801	Renee.Crasto@arlaw.com

LCTA's company representative's contact information is as follows:

CHERYL P. MCCORMICK	Phone: (225) 387-5960
CHIEF EXECUTIVE OFFICER	Fax: (225) 383-6705
LOUISIANA CABLE &	E-mail: cmc@lacable.org
TELECOMMUNICATIONS ASSOCIATION	
763 North Street	
Baton Rouge, LA 70802	

9.

LCTA specifically asks that it be copied on all filings made by any party, intervenor, staff or party at interest, as well as be provided notices of opportunities to submit information, attend hearings, technical conferences, plead and otherwise participate in any way in this proceeding.

10.

LCTA and its member companies, specifically reserve the right to file comments and present testimony as appropriate to respond to proceedings in this docket.

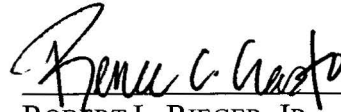
WHEREFORE, LCTA and its member companies pray that:

- 1) This Intervention be made of record and that it be granted full Intervenor status as prayed for herein;
- 2) LCTA's counsel and company contact person be enrolled and included on the Official Service List of this Docket;
- 3) The Commission, after full hearing based upon an evidentiary record developed through a proceeding comporting with substantive and procedural due process guarantees reach a decision in this Docket as may be consistent with the public interest; and

LCTA FURTHER PRAYS for all appropriate relief that law, equity and the nature of the proceeding afford it and as may be additionally merited in the premises.

Respectfully submitted,

ADAMS AND REESE LLP



ROBERT L. RIEGER, JR. (BAR # 18404)

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*Counsel for LOUISIANA CABLE &
TELECOMMUNICATIONS ASSOCIATION*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Intervention this day has been deposited in the United States Mail, postage prepaid to all persons listed on the Official Service List in this Docket as appearing of record on the date of this Intervention, this 10th day of February, 2012.


Renee C. Crasto