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**BEFORE THE UTAH PUBLIC SERVICE COMMISSION**

In the Matter of the Application of ROCKY MOUNTAIN POWER for Approval of a Standard Non-Reciprocal Pole Attachment Agreement	DOCKET NO. 10-035-43
In the Matter of the Application of ROCKY MOUNTAIN POWER for Approval of a Standard Reciprocal Pole Attachment Agreement	DOCKET NO. 10-035-____ <b>ATTM'S PETITION TO INTERVENE</b>

In accordance with Rule R746-100-7 of the Commission's Rules of Practice and Utah Code § 63-46b-9, New Cingular Wireless PCS, LLC d/b/a AT&T Mobility PCS ("ATTM") petitions the Utah Public Service Commission for permission to intervene in this docket, and states:

**I. NOTICES**

The name, address, and telephone number of the person to whom communications to ATTM should be sent is:

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## **II. IDENTITY OF PETITIONER**

ATTM is a provider of wireless telecommunications services and authorized to conduct business throughout Utah.

## **III. INTEREST OF PETITIONER**

ATTM's legal interests will be substantially affected by this proceeding as supported by the following statement of facts:

1. Rocky Mountain Power requested an order under Utah Admin. Code R746-345-3 approving a standard form Non-Reciprocal Pole Attachment Agreement (the "Agreement"), to be utilized between Rocky Mountain Power and cable and/or telecommunications companies desiring to attach facilities to the Rocky Mountain Power's distribution poles on or about April 26, 2010. On or about August 31, 2010 Rocky Mountain Power filed an application with the Utah Public Service Commission for approval of a Standard Reciprocal Pole Attachment Agreement. They also filed a motion to consolidate both the Non-Reciprocal and Reciprocal Pole Attachment Agreement proceedings.

2. ATTM is a wireless telecommunication service provider authorized to provide wireless telecommunications services in the State of Utah.

3. ATTM currently has many pole attachments with Rocky Mountain Power in the State of Utah, and, as wireless technology develops, may need to utilize additional attachments.

4. ATTM's customers in Utah may be impacted by ATTM's ability to attach to Rocky Mountain Power's poles upon just and reasonable rates, terms, and conditions.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing ATTM to intervene.

#### IV. NATURE OF INTERVENTION

The evidence to be presented by ATTM, if any, will be of material value to the Commission in its determination of the issues involved in this proceeding, and ATTM's intervention will not broaden those issues or delay the proceedings.

Accordingly, ATTM requests permission to intervene as a party to this proceeding and to participate to the full extent permitted under the Commission's rules and Utah Law.

Submitted September 20, 2010.

By: \_\_\_\_\_/s/\_\_\_\_\_  
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