Curt Huttsell, Ph.D.

FRONTIER COMMUNICATIONS CORPORATION

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Standard Non-reciprocal Pole Attachment Agreement

Docket No. 10-035-43

**Petition to Intervene of Frontier Communications Corporation** 

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, Frontier Communications Corporation ("Frontier"), on behalf of its affiliates Citizens Telecommunications Company of Utah ("CTC-UT") and Navajo Communications Company, Inc. ("Navajo"),

petitions the Public Service Commission ("Commission") for leave to intervene in the above-

entitled matter. In support of its petition Frontier states as follows:

1. CTC-UT and Navajo are local exchange carriers which provide public

telecommunications services pursuant to certificates of public convenience and necessity issued

by this Commission and which attach cable facilities to Rocky Mountain Power's utility poles to

provide public telecommunications services.

2. On April 26, 2010, Rocky Mountain Power requested an order from the

Commission pursuant to Utah Admin. Code R746-345-3 approving a standard form Non-

Reciprocal Pole Attachment Agreement (the "Agreement") for Rocky Mountain Power to use

with cable and telecommunications companies seeking to attach facilities to the Rocky Mountain

Power's distribution poles.

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3. The Commission invited comments from interested parties to be filed by May 17,

2010 and subsequently extended the comment period to June 15, 2010. Frontier submitted

comments on Rocky Mountain Power's proposed contract June 15, 2010.

4. On July 27, 2010, the Commission held a scheduling conference in which it

established a schedule and expanded this proceeding to include both standard non-reciprocal and

reciprocal pole attachment agreements with Rocky Mountain Power. Frontier participated in this

scheduling conference.

5. Frontier and its local exchange carrier affiliates CTC-UT and Navajo have a

significant interest in the above-captioned matter and their legal interests may be substantially

affected by the outcome.

Frontier's intervention and participation in this matter will not materially impair 6.

the prompt and orderly conduct of these proceedings.

If this petition is granted, Frontier requests that copies of all notices and filings in this

docket be served on:

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NOW THEREFORE, Frontier respectfully requests that the Commission enter an Order

granting Frontier's Petition to Intervene in this docket allowing Frontier to participate to the full

extent allowed by law. Frontier requests that if the Commission grants this petition, copies of all

notices and filings in this docket be served on Curt Huttsell, Ph.D. whose address appears above.

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Dated this 16<sup>th</sup> day of September, 2010.

Frontier Communications Corporation

Curt Huttsell, Ph.D.

Manager, Government and External Affairs

## Certificate of Service

I hereby certify that on September 16, 2010, I caused to be emailed a true and correct copy of the foregoing Petition to Intervene of Frontier Communications Corporation to the following:

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