Stephen F. Mecham (4089) Callister Nebeker & McCullough 10 East South Temple, Suite 900 Salt Lake City, Utah 84133 Telephone: 801 530-7300 Fax: 801 364-9127 Email: <u>sfmecham@cnmlaw.com</u> Attorneys for the Utah Rural Telecom Association

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation into the Rules, Standards, or Procedures other	
-	Petition to Intervene of the Utah Rural Telecom Association and Association Members

The Utah Rural Telecom Association ("URTA"), on behalf of itself and URTA members All West Communications, Bear Lake Communications, Beehive Telephone Company, Carbon/Emery Telcom, Central Utah Telephone, Direct Communications Cedar Valley, Emery Telcom, Gunnison Telephone, Hanksville Telcom, Manti Telephone, Skyline Telecom, South Central Utah Telephone Association, and Union Telephone ("URTA members") petitions the Public Service Commission ("Commission") for intervention in the above-entitled matter pursuant to Utah Code Ann. § 63G-04-207 and Utah Admin. Code R746-100-7.

The grounds for this petition are as follows:

1. URTA members are local exchange carriers providing public telecommunications services in Utah pursuant to certificates of public convenience and necessity issued by this Commission. Each URTA member is a public utility as defined in Utah Code Ann. § 54-2-1(15) and is charged with the duties described in Utah Code Ann. § 54-3-1, the statute under which the Commission is conducting this investigation to determine the

requirements for providing safe, reliable and adequate service. URTA members therefore have a significant interest in the above-captioned matter and their legal interests may be substantially affected by the outcome.

2. URTA's intervention and participation in this matter will not materially impair the prompt and orderly conduct of these proceedings.

URTA requests that copies of all notices and filings in this docket be served on:

Stephen F. Mecham Callister Nebeker & McCullough 10 East South Temple Suite 900 Salt Lake City, Utah 84133 Telephone: 801 530-7300 Facsimile: 801 364-9127 Email: <u>sfmecham@cnmlaw.com</u>

Please serve notices and filings electronically whenever possible.

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

granting URTA's petition to intervene in this docket allowing URTA and URTA members to

participate to the fullest extent allowed by law.

Dated this 11th day of September, 2008.

Callister Nebeker & McCullough

Stephen F. Mecham

## Certificate of Service

I hereby certify that on September 11, 2008, I caused a true and correct copy of the foregoing Petition to Intervene of the Utah Rural Telecom Association and Association Members to be emailed to the following:

Michael Ginsberg Patricia Schmid Assistant Attorneys General 160 East 300 South, Fifth Floor Salt Lake City, Utah 84111 <u>mginsberg@utah.gov</u> <u>pschmid@utah.gov</u>

Bill Duncan Division of Public Utilities 160 East 300 South, Fourth Floor Salt Lake City, Utah 84111 wduncan@utah.gov