

Jerold G. Oldroyd, Esq. (#2453)
Sharon M. Bertelsen, Esq. (#9759)
Ballard Spahr LLP
201 South Main Street, Suite 800
Salt Lake City, Utah 84111-2221
Telephone: (801) 531-3000
Facsimile: (801) 531-3001
OldroydJ@ballardspahr.com
BertelsenS@ballardspahr.com

Attorneys for Comcast Phone of Utah, LLC

Submitted November 30, 2012

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Consideration of Potential Changes in the Regulation of the Utah Universal Public Telecommunications Service Support Fund, in Response to Recent Changes in the Federal Universal Service Fund Program)
) Docket No. 12-999-10
)
) **PETITION TO INTERVENE**
)
)

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code R746-100-7, Comcast Phone of Utah, LLC (“Comcast”), respectfully petitions the Public Service Commission of Utah (“PSC”) for leave to intervene in the above-captioned matter concerning the consideration of potential changes in the regulation of the Utah Universal Public Telecommunications Service Support Fund, in response to recent changes in the Federal Universal Service Fund (“USF”) Program by the Federal Communications Commission (“FCC”). Comcast’s parent is the nation’s largest cable operator, and subsidiaries of the parent provide video, broadband, and interconnected Voice over Internet Protocol (“VoIP”) services.

The PSC opened this Docket as a result of a request from the Utah State Legislature to consider actions the State may take to address changes in the Federal USF initiated by the FCC in its order on USF reform, released November 18, 2011.¹ Comcast's parent has had years of experience with Universal Service obligations and is currently participating in the FCC's Universal Service reform dockets.

Comcast, in support of this Petition to Intervene, represents and states as follows:

1. Comcast is authorized to provide public telecommunications services within the State of Utah.² As a provider of telecommunications services in Utah, Comcast makes contributions to the Utah Universal Public Telecommunications Service Support Fund. As such, Comcast is directly impacted because Comcast's legal and financial interests would be substantially and directly affected by the outcome of this proceeding and the possible actions the State might take to address changes in the Federal USF.

2. Comcast's legal and financial interests, absent its intervention, would not be adequately represented by any other party to this proceeding.

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

¹ See *Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011); *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011).

² Certificate of Public Convenience and Necessity No. 2383, Docket No. 01-2383-01, issued January 11, 2002, to AT&T Broadband Phone of Utah, LLC, with a name change in Docket No. 03-2383-01, on February 12, 2003, to Comcast Phone of Utah, LLC.

WHEREFORE, Comcast respectfully requests that the PSC enter an Order granting Comcast's Petition to Intervene as a party in this Docket, allowing Comcast to participate to the full extent allowed under the Commission's rules and Utah law.

RESPECTFULLY SUBMITTED this 30th day of November 2012.

Comcast Phone of Utah, LLC

/s/ Sharon M. Bertelsen

Jerold G. Oldroyd, Esq.

Sharon M. Bertelsen, Esq.

BALLARD SPAHR LLP

201 South Main Street, Suite 800

Salt Lake City, Utah 84111-2221

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of November, 2012, an original, five (5) true and correct copies, and an electronic copy of the foregoing **PETITION TO INTERVENE** were hand-delivered to:

Gary L. Widerburg
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, UT 84111
psc@utah.gov

/s/ Sharon M. Bertelsen
