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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE PETITION OF
ALL AMERICAN TELEPHONE CO., INC., FOR
A NUNC PRO TUNC AMENDMENT OF ITS
CERTIFICATE OF AUTHORITY TO OPERATE
AS A COMPETITIVE LOCAL EXCHANGE
CARRIER WITHIN THE STATE OF UTAH

Docket No. 08-2469-01

**PETITION TO INTERVENE OF
AT&T COMMUNICATIONS OF
THE MOUNTAIN STATES, INC.
AND TCG UTAH**

In accordance with Rule R746-100-7 of the Commission's Rules of Practice and Utah Code § 63-46b-9, AT&T Communications of the Mountain States, Inc., and TCG Utah (collectively the "AT&T Companies"), petition the Utah Public Service Commission for permission to intervene in this docket, and state:

I. NOTICES

The name, address, and telephone number of the persons to whom communications to the AT&T Companies should be sent are:

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II. IDENTITY OF PETITIONER

The AT&T Companies are telecommunications companies authorized to provide local exchange, intraexchange, and interexchange telecommunications services throughout Utah.

III. INTEREST OF PETITIONER

The AT&T Companies' legal interests will be substantially affected by this proceeding, pursuant Section 63G-4-207. The AT&T Companies provide intrastate and interstate long distance services in Utah and are customers of local exchange carriers throughout the state. For more than a year All American's monthly exchange access service bills to the AT&T Companies have included terminating access charges for millions of minutes of traffic associated with chat, conference, international and other "traffic pumping" activities which the AT&T Companies believe are designed to inflate interexchange carrier access bills. Although All American has no authority to operate in Beehive's Utah service area, it appears that all of virtually all of this traffic is associated with Beehive area telephone numbers. The AT&T Companies would also note that, because of their interests in this proceeding, they would oppose any effort to exclude intervenors by having this docket designated as an informal proceeding under R746-100-2, and would wish to file reply comments and be heard if such designation is sought by any party.

IV. NATURE OF INTERVENTION

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

Accordingly, the AT&T Companies request 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.

RESPECTFULLY SUBMITTED this 22nd day of December 2008.

AT&T Communications of the
Mountain States, Inc. and TCG Utah

By: _____ /s/_____
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