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Attorney for Qwest Corporation

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Consideration of the Costs to the Department of Community and Culture (DCC) for Determining Eligibility for Lifeline Applications	Docket No. 10-2528-01 QWEST CORPORATION'S PETITION TO INTERVENE
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Pursuant to the Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R476-100-7 and § 63-46b-9, Qwest Corporation (“Qwest”) respectfully petitions to intervene in the above-referenced proceeding before the Public Service Commission of Utah (“Commission”). As grounds for such intervention, Qwest states that it has legal rights or interests that are or may be substantially affected by these proceedings, that there are facts which support this position detailed below, and that Qwest requests that it be allowed intervention.

In support of this Motion, Qwest states as follows:

1. Qwest is an Eligible Telecommunications Carrier (“ETC”) and provides Lifeline service pursuant to the Utah Public Service Commission Rule R746-341.
2. In its December 2, 2010 Notice of Agency Action in this proceeding, the Commission ordered that “Each respondent/party served, shall file a response in 30 days, stating its appearance in this matter and identifying any additional issues it desires the Commission to consider in these proceedings.” Qwest, with this filing, responds to the Commission, but at this

time has not identified additional issues that it desires that the Commission to address in this proceeding. However, Qwest may identify other issues when or after the Commission holds a technical conference in this proceeding.

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

4. The name, address, and telephone number of the person to whom communications should be addressed is:

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WHEREFORE, for the reasons set forth above, Qwest requests that the Commission grant this timely petition to intervene and permit Qwest to participate in this proceeding to the full extent allowed by the rules of the Commission and by Utah law.

RESPECTFULLY SUBMITTED this 3rd day of January, 2011

QWEST CORPORATION



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