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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF ALL WEST
COMMUNICATIONS, INC.'s
APPLICATION FOR USF ELIGIBILITY

MOTION TO INTERVENE

DOCKET NO. 11-2180-01

The Utah Rural Telecom Association (“URTA”), on behalf of itself and URTA members, Bear Lake Communications, Beehive Telephone Company, Carbon/Emery Telcom, Inc., Central Utah Telephone, Inc., Direct Communications Cedar Valley, Emery Telcom, Inc., Gunnison Telephone, Hanksville Telcom, Inc., Manti Telephone Company, Skyline Telecom, South Central Utah Telephone Association, Inc., UBTA-UBET Communications, Inc., and Union Telephone (“URTA members”)¹ 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. As grounds for such intervention, URTA states that its members have 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 URTA requests that it be allowed intervention on behalf of its members.

¹ All West Communications, Inc. is a member of URTA, but it is the Petitioner in this docket and is therefore not included on this list.

In support of this Petition URTA states as follows:

1. URTA is a Utah non-profit corporation. URTA members, like All West Communications, Inc. (“All West”), are local exchange carriers providing public telecommunications services in Utah pursuant to certificates of public convenience and necessity issued by this Commission. URTA members’ rates for service are regulated by this Commission. Additionally, the URTA Members’ eligibility for State Universal Service Fund Distributions is regulated by this Commission.

2. In a Stipulation filed in this docket by All West and the Division of Public Utilities (“Division”) on September 23, 2011, All West and the Division resolved all issues in this docket except: 1) normalization of depreciation; and 2) the appropriate application of approved depreciation rates under group asset depreciation accounting to include treatment of fully depreciated accounts (collectively the “Reserved Issues”).

3. The Reserved Issues, and specifically, the Division’s departure from the general concepts and treatment of group asset depreciation, are issues that will likely significantly affect each of the URTA members since group asset depreciation is used by most, if not all, of the URTA members as permitted by the FCC, USAC, and regulatory accounting principles. The decisions the Commission makes in this docket will set precedent for each of the URTA member’s treatment and use of group asset depreciation and accounting, and will affect the URTA members accounting procedures, accounting and consultant costs, and future rate cases and USF eligibility before this Commission. URTA and URTA members therefore have a significant interest in the above-captioned matter and their legal rights or interests may be substantially affected by the outcome of the reserved issues in this docket.

4. The interests of justice and the orderly and prompt conduct of this proceeding will

not be materially impaired by allowing URТА to intervene.

5. URТА requests that copies of all notices and filings in this docket be served on:

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Please serve notices and filings electronically whenever possible.

NOW THEREFORE, URТА respectfully requests that the Commission enter an Order granting URТА's petition to intervene in this docket allowing URТА and URТА members to participate to the fullest extent allowed by law.

Dated this 11th day of October, 2011.

BLACKBURN & STOLL, LC

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CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the Motion to Intervene, Docket No. 11-2180-01 was sent to the following individuals by electronic mail, this 11th day of October, 2011.

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