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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application for Increase in USF Distribution for Manti Telephone Company	<b>MOTION TO INTERVENE</b>  <b>Docket No. 13-046-01</b>
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The Utah Rural Telecom Association (“URTA”), on behalf of itself and URTA members, All West Communications, Inc., Bear Lake Communications, Carbon/Emery Telcom, Inc., Central Utah Telephone, Inc., Direct Communications Cedar Valley, Emery Telcom, Inc., Hanksville Telcom, Inc., Skyline Telecom, South Central Utah Telephone Association, Inc., UBTA-UBET Communications, Inc., and Union Telephone (“URTA members”)<sup>1</sup> 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.

In support of this Petition URTA states as follows:

1. URTA is a Utah non-profit corporation. URTA members, like Manti Telephone Company (“Manti”), are local exchange carriers providing public interstate and intrastate

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<sup>1</sup> Manti Telephone Company is a member of URTA, but it is the Petitioner in this docket and is therefore not included on this list.

telecommunications services in Utah pursuant to certificates of public convenience and necessity issued by this Commission. URTA members' rates for intrastate service are regulated by this Commission. Additionally, the URTA Members' eligibility for Utah Universal Service Fund Distributions is regulated by this Commission.

2. The URTA members are concerned that long-established principles regarding allocation of costs for fiber facilities used to provide interstate and intrastate services as well as the assignment of costs between regulated and non-regulated companies may be subject to *ad hoc* challenge by the Division of Public Utilities and Office of Consumers Services. URTA and its members base this concern on the Testimony previously filed in Docket 08-046-01 by the Division of Public Utilities and the Office of Consumer Services. Any departure from well settled principles regarding allocation of fiber facilities and the establishment of wholesale broadband rates, are issues that will likely significantly affect each of the URTA members. The decisions the Commission makes in this docket will set precedent for each of the URTA members, and could have a substantial impact on the URTA members. 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 issues in this docket.

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

4. URTA 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 16<sup>th</sup> day of October, 2013.

BLACKBURN & STOLL, LC

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Brett N. Anderson  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Utah Rural Telecom Association’s Motion to Intervene was transmitted electronically (email) on this the 16<sup>th</sup> day of October, 2013 to the following:

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