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Attorneys for Central Utah Telephone, Inc.

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Telephone Number Conservation Measures for (801) Area Code Relief	)	DOCKET NO. 99-999-04
In the Matter of the Request of North	)	<u>DOCKET NO. 99-999-05</u>
American Numbering Plan Administrator for a New Area Code within the (801) Area Code	)	PETITION TO INTERVENE OF CENTRAL UTAH TELEPHONE

Central Utah Telephone, Inc. ("Central"), by and through its attorneys, respectfully petitions the Public Service Commission of Utah (the "Commission"), pursuant to <u>Utah Code</u>

<u>Annotated</u> § 63-46b-9 and <u>Utah Admin. Code</u> R 746-100-7 to intervene in the above captioned matter. In support of this Petition, represents the following and as grounds therefor submits to the Commission that:

1. <u>Identity of Petitioner.</u> Central brings this petition on its own behalf and on behalf of Skyline Telecom ("Skyline"), a wholly owned subsidiary of Central. Central and Skyline are independent telephone companies in the State of Utah. Central and Skyline are "local exchange"

carriers" as defined by the Telecommunications Act of 1996 (the "Act") in 47 U.S.C. § 153(44) and "rural telephone companies" as defined in 47 U.S.C. § 153(47). Central and Skyline are also "telecommunication corporations" as defined in Utah Code Ann. § 54-8b-2(13) and are "incumbent telephone corporations" as defined in Utah Code Ann. § 54-8b-2(5). Central and Skyline are authorized to provide and do provide telecommunications services in the State of Utah.

2. <u>Interest of Petitioner.</u> As facilities based local exchange telecommunications providers in the State of Utah, Central and Skyline have a substantial interest in this proceeding. Central is the owner of a service territory in Utah County in Spanish Fork Canyon commonly referred to as the Covered Bridge area. Skyline is the owner of the Goshen exchange, which is located within Utah County. These exchanges or service territories are located within the 801 area code. All other exchanges of Central and Skyline are located in the 435 area code. Central and Skyline have a substantial interest in the outcome of this docket and may request that as part of any 801 area code relief plan that the boundaries of the 435 area code be adjusted to encompass the foregoing exchanges or service territories.

Utah Code Ann. § 63-46b-9 permits intervention if the petitioner's legal rights or interests are substantially affected. The rights, duties, privileges and other interests of Central and Skyline may be substantially affected by this proceeding. Intervention is necessary for Central and Skyline to be able to participate as their interests may appear.

3. <u>Interests of Justice Not Impaired.</u> The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing the intervention of Central. Central's intervention will not prejudice any party nor will intervention in this

proceeding unduly broaden its nature or scope. Allowing this timely intervention of Central will also not delay this proceeding.

4. Notice. If intervention is granted, copies of all notices and filings should be served on the following:

Stanley K. Stoll
Jerry D. Fenn
BLACKBURN & STOLL, L.C.
77 West 200 South, Suite 400
Salt Lake City, UT 84101
Telephone: (801) 521-7900
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NOW THEREFORE, Central respectfully requests that the Commission issue an Order authorizing Central to intervene and fully participate in the above captioned proceeding. A proposed form of Order is submitted herewith

DATED this \_\_\_\_\_ day of February, 2000.

BLACKBURN	&	STOI	LL,	L.C.

Jerry D. Fenn Attorneys for Central Utah Telephone, Inc.

### **MAILING CERTIFICATE**

I hereby certify that I caused a copy of the foregoing **PETITION FOR INTERVENTION OF CENTRAL UTAH TELEPHONE** regarding Docket Nos. 99-999-04 & 99-999-05, to be mailed by first class mail, postage prepaid, this 16<sup>th</sup> day of February, 2000 to the following:

## U.S. West Communications, Inc.

Gregory B. Monson

David L. Mortensen

Stoel Rives LLP

201 South Main Street Suite
#1100

Salt Lake City, Utah 84111

### Lynn Anton Stang

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## **AT&T and TCG UTAH**

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# BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Telephone Number Conservation Measures for (801) Area Code Relief	) DOCKET NO. 99-999-04					
In the Matter of the Request of North American Numbering Plan Administrator for a New Area Code within the (801) Area Code	) DOCKET NO. 99-999-05 ) ORDER					
Central Utah Telephone, Inc. has petitioned the Commission to intervene in the above-described and numbered matter.						
Based upon the Petition, and good cause appearing therefor, the Commission makes the						
following						
ORDER						
NOW, THEREFORE, IT IS HEREBY ORDERED that the petition of Central Utah						
Telephone to intervene be and hereby is granted.						
DATED in Salt Lake City, Utah, this day of February, 2000.						
/s/ Stephen F. Mecham, Chairman						
<u>/s/ (</u>	/s/ Clark D. Jones, Commissioner					
<u>/s/ (</u>	Constance White, Commissioner					
ATTEST:  Julie Orchard						

Commission Secretary