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Attorneys for Utah Rural Telecom Association

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Complaint of:

BEAVER COUNTY, BOX ELDER COUNTY,)
CACHE COUNTY, CARBON COUNTY,)
DAVIS COUNTY, DUCHESNE COUNTY,)
EMERY COUNTY, GARFIELD COUNTY,)
GRAND COUNTY, IRON COUNTY, JUAB)
COUNTY, KANE COUNTY, MORGAN)
COUNTY, PIUTE COUNTY, RICH COUNTY,)
SALT LAKE COUNTY, MILLARD COUNTY,)
SANPETE COUNTY, SEVIER COUNTY,)
SUMMIT COUNTY, TOOELE COUNTY,)
UINTAH COUNTY, UTAH COUNTY,)
WASATCH COUNTY, WASHINGTON)
COUNTY, WAYNE COUNTY, WEBER)
COUNTIES, AND ALL OTHER PERSONS)
OR ENTITIES SIMILARLY SITUATED,)

DOCKET NO. 01-049-75

**PETITION FOR INTERVENTION
OF UTAH RURAL TELECOM
ASSOCIATION**

Complainants,)

vs.)

QWEST CORPORATION fka US WEST)
COMMUNICATIONS, INC., fka MOUNTAIN)
STATES TELEPHONE & TELEGRAPH)
SERVICES, INC.)

Respondent.)

The Utah Rural Telecom Association (“URTA”) brings this petition for leave to intervene in this Docket on behalf of its member companies All West Communications, Inc., Bear Lake Communications, Inc., Beehive Telephone

Co., Central Utah Telephone Inc., Emery Telephone and its affiliates Carbon/Emery Telcom and Hanksville Telcom, Frontier Communications of Utah, Gunnison Telephone Co., Manti Telephone Company, South Central Utah Telephone Association, Skyline Telecom, UBTA-UBET Communications and Union Telephone Co. URTA, by and on behalf of its member companies, respectfully submits that it should be granted status as an intervenor in this docket to participate as its interests may appear. As Incumbent Local Exchange Providers (“ILECs”) in this state, URTA members have a substantial interest in this proceeding. While this docket at present involves directly Qwest Corporation and not other ILECs in the State, it is possible that the declaration sought by the Counties herein may have broader application and may impact URTA members. Moreover, the issues to be raised in this docket may address retroactive rate-making and other regulatory principles which may have consequences for URTA members. URTA’s intervention will not unduly complicate nor unnecessarily delay these proceedings nor will it change the schedule previously established by the Commission in this docket.

URTA requests that copies of all notices and filings in this docket should be served on the following:

Jerry D. Fenn
BLACKBURN & STOLL, L.C.
Attorneys for Utah Rural Telecom Association
77 West 200 South, Suite 400
Salt Lake City, UT 84101

Ms. Nancy Gibbs
Executive Director
Utah Rural Telecom Association
2655 N. Center Street
Lehi, UT 84043

NOW THEREFORE, the Utah Rural Telecom Association respectfully requests it be permitted by the Commission to intervene in this docket.

DATED this day of December, 2004.

BLACKBURN & STOLL, L.C.

Jerry D. Fenn
Attorneys for Utah Rural Telecom

Association

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing **PETITION FOR INTERVENTION OF UTAH RURAL TELECOM ASSOCIATION** regarding Docket No. 01-049-75, to be mailed by first class mail, postage prepaid, this day of December, 2004 to the following:

Michael Ginsberg
Assistant Attorney General
P.O. Box 140857
Salt Lake City, UT 84114
