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 Attorneys for the Utah Rural Telecom Association

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Application of</p> <p>IDT America, Corp.</p> <p>To Expand its Certificate of Public Convenience And Necessity to Provide Facilities-Based and Resold LocalExchange Services Within the State of Utah</p>	<p style="text-align: center;"><u>Docket No. 06-2464-01</u></p> <p>Petition to Intervene of the Utah Rural Telecom Association and Association Members; and,</p> <p>Petition to Exclude from Application all Exchanges Serving Fewer than 5,000 Access Lines</p>
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The Utah Rural Telecom Association (“URTA”), on behalf of itself and URTA members All West Communications, Bear Lake Communications, Beehive Telephone Company, Carbon/Emery Telcom, Central Utah Telephone, Direct Communications Cedar Valley, Emery Telcom, Citizens Telecommunications Company of Utah (d/b/a Frontier Communications of Utah), Gunnison Telephone, Hanksville Telcom, Manti Telephone, Navajo Communications Company, Inc., Skyline Telecom, South Central Utah Telephone Association, UBTA-UBET Communications, and Union Telephone (“URTA members”) petitions the Public Service Commission (“Commission”) for automatic intervention in the above-entitled matter pursuant to Utah Code Ann. § 54-8b-2.1(3)(b). URTA members are local exchange carriers providing public telecommunications services pursuant to certificates of public convenience and necessity issued by this Commission within the same geographic areas where the applicant is seeking to provide service and, therefore, qualify for automatic intervention.

URTA, on behalf of itself and the URTA members, all of whom serve fewer than 30,000 access lines, also petitions the Commission to exclude from the application all local exchanges with fewer than 5,000 access lines owned or controlled by URTA members in accordance with Utah Code Ann. § 54-8b-2.1(3)(c). Such exclusion is consistent with the public interest because of the harmful effects granting Applicant's application could have on URTA members' costs and customers and on the state Universal Service Fund.

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

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NOW THEREFORE, URTA respectfully requests that the Commission enter an Order granting URTA's petition to intervene in this docket allowing URTA and URTA members to participate to the full extent allowed by law. URTA also requests that the Commission enter an Order excluding from the application all local exchanges with fewer than 5,000 access lines owned or controlled by URTA members.

Dated this 9th day of June, 2006.

Callister Nebeker & McCullough

Stephen F. Mecham

Certificate of Mailing

I hereby certify that on June 9, 2006, I caused a true and correct copy of the Petition to Intervene of the Utah Rural Telecom Association and Association Members and Petition to Exclude from Application all Exchanges Serving Fewer than 5,000 Access Lines filed in Docket No. 06-2464-01 to be emailed to the following:

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