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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Bresnan
Broadband of Utah, LLC For a Certificate of
Public Convenience and Necessity to Operate
as a Competitive Local Exchange Carrier in
Utah

PETITION TO INTERVENE

DOCKET NO. 07-2476-01

UBTA-UBET Communications, Inc. (“UBTA-UBET”), pursuant to Section 63-46b-9
Utah Code Ann. (2001) and Utah Admin. R. 746-100-7, respectfully petitions the Public Service
Commission of Utah (the “Commission”) for leave to intervene in the above-captioned docket.

UBTA-UBET seeks to intervene on the following grounds:

1. UBTA-UBET is the Incumbent Local Exchange Carrier (ILEC) in the local exchange
area in and around Vernal, Utah, operating in Utah pursuant to a certificate of public
convenience and necessity previously issued by the Commission. Bresnan Broadband of Utah,
LLC (“Bresnan”) seeks certification from the Commission to provide local exchange service the
Vernal, Utah exchange area. As the ILEC in the Vernal, Utah local exchange area, UBTA-
UBET has a substantial interest in this proceeding. The issues to be considered by the
Commission may impact UBTA-UBET’s business interests, operations, as well as the interests
of the subscribers, residential and commercial, that UBTA-UBET services in the Vernal, Utah
exchange. Those issues may also impact UBTA-UBET’s continued ability to provide enhanced
telecommunications services to the subscribers the Vernal, Utah exchange.

2. The interests of justice and the orderly conduct of these proceedings will not be
impaired by allowing UBTA-UBET’s participation. Bresnan’s application was recently filed

February 5, 2007. Therefore UBTA-UBET's Petition to Intervene is prompt and timely, and its intervention and participation will not delay the proceedings in any way.

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

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NOW THEREFORE, UBTA-UBET respectfully requests that the Commission enter an Order granting UBTA-UBET's petition to intervene in this docket and to participate to the full extent as allowed by law.

DATED this 20th day of February, 2007.

BLACKBURN & STOLL, L.C.

/s/
Stanley K. Stoll
Kira M. Slawson
Attorneys for UBTA-UBET Communications, Inc.

CERTIFICATE OF MAILING

I hereby certify that on this 20th day of February, 2007, I caused to be mailed a true and correct copy of the foregoing MOTION TO INTERVENE by first-class mail, postage prepaid to:

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