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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of
Momentum Telcom, Inc.

PETITION TO INTERVENE

For a Certificate of Public Convenience and
Necessity to Operate as a Competitive Local
Exchange Carrier in Utah

DOCKET NO. 08-2496-01

Carbon/Emery Telcom, Inc. (“Carbon/Emery”), 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 for leave to intervene in the above-captioned docket. Carbon/Emery seeks to intervene on the following grounds:

1. Carbon/Emery is the Incumbent Local Exchange Carrier (ILEC) in the local exchange area in and around Price, Utah, operating in Utah pursuant to a certificate of public convenience and necessity previously issued by the Commission. Momentum Telcom, Inc. (“Momentum”) seeks certification from the Commission to provide wholesale service to cable service operators with whom they are partnering to provide residential and commercial VoIP service in the Price, Utah exchange area. As the ILEC in the Price, Utah local exchange area, Carbon/Emery has a substantial interest in this proceeding. The issues to be considered by the Commission may impact Carbon/Emery’s business interests, operations, as well as the interests of the subscribers, residential and commercial, that Carbon/Emery services in the Price, Utah exchange. Those

issues may also impact Carbon/Emery's continued ability to provide enhanced telecommunications services to the subscribers the Price, Utah exchange.

2. The interests of justice and the orderly conduct of these proceedings will not be impaired by allowing Carbon/Emery's participation. Momentum's application was recently filed April 29, 2008, therefore Carbon/Emery's Petition to Intervene is prompt and timely, and its intervention and participation will not delay the proceedings in any way.

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

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

DATED this ____ day of June, 2008.

BLACKBURN & STOLL, L.C.

Stanley K. Stoll
Kira M. Slawson
Attorneys for Carbon/Emery Telcom, Inc.

CERTIFICATE OF MAILING

I hereby certify that on this _____ day of June, 2008, 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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