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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Momentum Telecom, Inc. For a Certificate of Public Convenience and Necessity to Operate as a Competitive Local Exchange Carrier in Utah	Docket No. 08-2496-01 Petition to Intervene of the Utah Rural Telecom Association and Association Members
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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, Central Utah Telephone, Direct Communications Cedar Valley, Emery Telcom, Gunnison Telephone, Hanksville Telcom, Manti Telephone, Skyline Telecom, South Central Utah Telephone Association, UBTA-UBET, and Union Telephone (“URTA members”) petitions the Public Service Commission (“Commission”) for intervention in the above-entitled matter pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. R746-100-7.

The grounds for this petition are as follows:

1. URTA members are local exchange carriers providing public telecommunications services in Utah pursuant to certificates of public convenience and necessity issued by this Commission. URTA members participate in the state universal service fund to help keep customer rates reasonable in high-cost rural areas and their customers pay the universal service

fund surcharge. To the extent this proceeding could affect the universal service fund or establish precedent in determining how and in what form applicants will be certificated to enter rural areas in Utah to provide telecommunications services, URTA and URTA members have a significant interest in the above-captioned matter and their legal interests may be substantially affected by the outcome.

2. URTA's intervention and participation in this matter will not materially impair the prompt and orderly conduct of these proceedings.

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.

Dated this 20th day of June, 2008.

Callister Nebeker & McCullough

Stephen F. Mecham

Certificate of Service

I hereby certify that on June 20, 2008, I caused a true and correct copy of the foregoing Petition to Intervene of the Utah Rural Telecom Association and Association Members to be mailed by first class mail, postage prepaid, to the following:

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