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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Amended 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

Skyline Telecom (“Skyline”), 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. Skyline seeks to intervene on the following grounds:

1. Skyline is the Incumbent Local Exchange Carrier (ILEC) in the local exchange area in and around Wendover, 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 local exchange and interexchange services to end user customers, as well as IP telephony (VoIP) services, on a wholesale basis to business and residential cable company customers in partnership with existing cable operators in the Wendover, Utah exchange area. Momentum inaccurately states in its Verified Amended Application that CentraCom¹ controls more than 5,000 access lines in the Wendover, Utah

¹CentraCom Interactive is not the ILEC in the Wendover, Utah exchange. Rather,

exchange. In fact, Skyline has substantially fewer than 5,000 access lines in the Wendover, Utah exchange. Therefore, as the ILEC in the Wendover, Utah local exchange area, Skyline has a substantial interest in this proceeding. The issues to be considered by the Commission may impact Skyline's business interests, operations, as well as the interests of the subscribers, residential and commercial, that Skyline services in the Wendover, Utah exchange. Those issues may also impact Skyline's continued ability to provide enhanced telecommunications services to the subscribers the Wendover, Utah exchange.

2. The interests of justice and the orderly conduct of these proceedings will not be impaired by allowing Skyline's participation. Momentum's Amended Application was recently filed on or about July 22, 2008, therefore Skyline's Petition to Intervene is prompt and timely, and its intervention and participation will not delay the proceedings in any way.

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

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NOW THEREFORE, Skyline respectfully requests that the Commission enter an Order

Skyline Telecom is the ILEC.

granting Skyline's petition to intervene in this docket and to participate to the full extent as allowed by law.

DATED this ____ day of August, 2008.

BLACKBURN & STOLL, L.C.

Stanley K. Stoll
Kira M. Slawson
Attorneys for Skyline Telecom

CERTIFICATE OF MAILING

I hereby certify that on this _____ day of August, 2008, I caused to an original and five (5) true and correct copies of the foregoing MOTION TO INTERVENE to be hand delivered to:

Julie Orchard
Commission Secretary
Public Service Commission of Utah
Herbert M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, UT 84114

and a true and correct copy sent via email to the following:

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