

Stanley K. Stoll (3960)
Kira M. Slawson (7081)
BLACKBURN & STOLL, LC
257 East 200 South, Suite 800
Salt Lake City, Utah 84111
Telephone (801) 521-7900

Attorneys for UBTA-UBET Communications, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Beehive
Telecom, Inc.

PETITION TO INTERVENE

For an Amended Certificate of Public
Convenience and Necessity to Provide Local
Exchange Services within the State of Utah

DOCKET NO. 09-051-02

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 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. Beehive Telecom, Inc.
 (“Beehive”) seeks amendment to its presently held Certificate of Public Convenience and
Necessity (CPCN) to permit it to provide intrastate and interexchange services within and
throughout the State of Utah, specifically in all or part of the service territories of incumbent
local exchange carriers (ILECs), with greater than 5,000 access lines that are owned or controlled
by ILECs with greater than 30,000 access lines in the State of Utah. 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. Beehive's application was recently filed April 6, 2009, 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:

Stanley K. Stoll
Kira M. Slawson
BLACKBURN & STOLL, L.C.
Attorneys for UBTA-UBET Communications, Inc.
257 East 200 South, Suite 800
Salt Lake City, UT 84111
Telephone: (801) 521-7900
Facsimile: (801) 521-7965

UBTA-UBET Communications, Inc.
Attn: Bruce Todd
211 East 200 North
P.O. Box 398
Roosevelt, UT 84066
Telephone: (435) 646-5007

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 _____ day of April, 2009.

BLACKBURN & STOLL, L.C.

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

CERTIFICATE OF MAILING

I hereby certify that on this _____ day of April, 2009, I caused to be mailed a true and correct copy of the foregoing MOTION TO INTERVENE by first-class mail, postage prepaid to:

Michael Ginsberg
Assistant Attorney General
Division of Public Utilities
mginsberg@utah.gov

Paul Proctor
Assistant Attorney General
Committee of Consumer Services
pproctor@utah.gov

Judith O. Hooper
Beehive Telecom, Inc.
2000 Sunset Road
Lake Point, UT 84074
hooper@beehive.net

Stephen F. Mecham
Callister, Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, UT 84133
sfmecham@cnmlaw.com

Curt Huttzell
Frontier Communications Corporation
1387 West 2250 South
Woods Cross, UT 84087
Curt.huttzell@frontiercorp.com

Kira M. Slawson