
BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Beehive Telecom, Inc. for an Amended Certificate of Public Convenience and Necessity to Provide Local Exchange Services within the State of Utah

PETITION TO INTERVENE

DOCKET NO. 09-051-02

Citizens Telecommunications Company of Utah (d/b/a Frontier Communications Company of Utah), 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. Citizens Telecommunications Company of Utah (hereinafter “Frontier”) seeks to intervene on the following grounds:

1. Frontier is the Incumbent Local Exchange Carrier (“ILEC”) serving the Moab and Lake Powell (a/k/a “Bullfrog”) Exchanges in Utah in addition to other telephone exchanges in Grand, San Juan, Box Elder and Millard Counties. Frontier provides public telecommunications services in Utah pursuant to a certificate of public convenience and necessity previously issued by this Commission.

2. Although Frontier has not been notified as required by Section 54-8b-2.1(3)(b) Utah Code Ann. (2001), it has come to Frontier’s attention that on July 13, 2009, Beehive Telecom, Inc. (“Beehive”) amended its initial Application in this Docket. Beehive’s July 13, 2009, amendment limits the authority sought to the provision of public telecommunications services in Frontier’s Moab and Lake Powell Exchanges. In its original application, Beehive sought

expanded authority to serve outside of Qwest's serving territory in exchanges of greater than 5,000 lines operated by carriers with fewer than 30,000 lines.

2. Section 54-8b-2.1(3)(b) Utah Code Ann. (2001) provides that telecommunications corporations holding a certificate to provide public telecommunications service within the geographic area where an applicant is seeking to provide telecommunications service shall be provided notice of the application and granted **automatic status as an intervener.**

3. As the ILEC in the Moab and Lake Powell Exchanges, Frontier has a substantial interest in this proceeding. The issues to be considered by the Commission will affect Frontier's business interests and operations, as well as the interests of the subscribers, residential and commercial, that Frontier serves in the Moab and Lake Powell Exchanges.

4. The interests of justice and the orderly conduct of these proceedings will not be unduly impaired by allowing Frontier's participation. Since Beehive's amended application was filed on July 13, 2009, Frontier's Petition to Intervene is prompt and timely.

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

Curt Huttsell, Ph.D.
Frontier Communications
1387 West 2250 South
Woods Cross, UT 84087
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NOW THEREFORE, Frontier respectfully requests that the Commission enter an Order granting Frontier's Petition to intervene in this Docket and to participate to the full extent as allowed by law.

DATED this 24th day of July, 2009.

A handwritten signature in black ink that reads "Curt Huttsell". The signature is written in a cursive style with a large initial "C".

Curt Huttsell, Ph.D.
Manager, Government and External Affairs
Frontier Communications