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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>Bresnan Broadband of Utah, LLC, a Utah limited liability company,</p> <p>Petitioner,</p> <p>vs.</p> <p>UBTA-UBET Communications, Inc., a Utah corporation,</p> <p>Respondent.</p>	<p><b>Docket No. 09-2476-01</b></p> <p><b>Petition to Intervene of the Utah Rural Telecom Association and Association Members</b></p>
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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, Carbon/Emery Telcom, Central Utah Telephone, Direct Communications Cedar Valley, Emery Telcom, Gunnison Telephone, Hanksville Telcom, Manti Telephone, Skyline Telecom, South Central Utah Telephone Association, and Union Telephone (“URTA members”)<sup>1</sup> petitions the Public Service Commission (“Commission”) for intervention in the above-entitled matter pursuant to Utah Code Ann. § 63G-04-207 and Utah Admin. Code R746-100-7.

The grounds for this petition are as follows:

1. URTA is a Utah non-profit corporation. URTA members, like UBTA-UBET

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<sup>1</sup> UBTA-UBET Communications is a member of URTA, but it is the Respondent in this docket and is therefore not included on this list.

Communications, are local exchange carriers providing public telecommunications services in Utah pursuant to certificates of public convenience and necessity issued by this Commission. The complaint filed in this docket is associated with and an extension of Docket No. 08-2476-02 in which the Commission allowed URTA to fully participate and could have been filed in that docket. As was true in Docket No. 08-2476-02, the decisions the Commission makes in this docket will set precedent for interconnection disputes for all other URTA members. URTA and URTA members therefore have a significant interest in the above-captioned matter and their legal rights or 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 will meet the schedule set in this docket by scheduling order dated August 31, 2009.

URTA requests that copies of all notices and filings in this docket be served on:

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Please serve notices and filings electronically whenever possible.

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 fullest extent allowed by law.

Dated this 1<sup>st</sup> day of September, 2009.

Callister Nebeker & McCullough

/s/ Stephen F. Mecham  
Stephen F. Mecham

Certificate of Service

I hereby certify that on September 1, 2009, I caused a true and correct copy of the foregoing Petition to Intervene of the Utah Rural Telecom Association and Association Members to be emailed to the following:

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