

Stephen F. Mecham (4089)
Callister Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, Utah 84133
Telephone: 801 530-7300
Fax: 801 364-9127
Email: sfmecham@cnmlaw.com

Attorneys for the Utah Rural Telecom Association

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Utah for the Limited Purpose of Offering Lifeline Service to Qualified Households	<p style="text-align: center;"><u>Docket No. 09-2511-01</u></p> <p>Petition to Intervene of the Utah Rural Telecom Association and Association Members</p>
--	--

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, Strata Networks, and Union Telephone (“URTA members”) petition the Public Service Commission (“Commission”) to intervene 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 are also eligible telecommunications carriers (“ETC”) and participate in the state universal

service fund to keep customer rates reasonable in high-cost rural areas. TracFone Wireless, Inc. is petitioning to provide public telecommunications service in URTA members' service territories. In addition, if the Commission designates TracFone as an ETC, TracFone would be eligible to seek support from the state universal service fund. URTA and URTA members therefore 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 will follow the schedule the Commission establishes in this proceeding.

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

Stephen F. Mecham
Callister Nebeker & McCullough
10 East South Temple Suite 900
Salt Lake City, Utah 84133
Telephone: 801 530-7300
Facsimile: 801 364-9127
Email: sfmecham@cnmlaw.com

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 1st day of December, 2009.

Callister Nebeker & McCullough

Stephen F. Mecham

Certificate of Mailing

I hereby certify that on December 1, 2009 I caused a true and correct copy of the Petition to Intervene of the Utah Rural Telecom Association and Association Members filed in Docket No. 09-2511-01 to be emailed to the following:

Michael Ginsberg
Assistant Attorney General
160 East 300 South, Fifth Floor
Salt Lake City, Utah 84111
mginsberg@utah.gov

Paul Proctor
Assistant Attorney General
160 East 300 South, Fifth Floor
Salt Lake City, Utah 84111
pproctor@utah.gov

Mitchell F. Brecher
Debra McGuire Mercer
GREENBERG TRAURIG, LLP
2101 L Street, NW
Suite 1000
Washington, D.C. 20037
Telephone: (202) 331-3100
Facsimile: (202) 331-3101
brecherm@gtlaw.com
mercerdm@gtlaw.com
