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Attorneys for the Utah Rural Telecom Association

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Virgin Mobile USA, L.P. Petition for Limited Designation as an Eligible Telecommunications	DOCKET NO. 10-2521-01
	Petition to Intervene of the Utah Rural Telecom Association and Association Members

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.
2. 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.

3. Virgin Mobile USA, L.P. is petitioning to provide public telecommunications service in URTA members' service territories. If the Commission designates Virgin Mobile as an ETC, Virgin Mobile would be eligible to seek support from the state universal service fund.
4. Virgin Mobile may be seeking to provide service without contributing to 911, Poison Control, the Relay service, and the state universal service fund which, if true, would give it a competitive advantage and harm these public interest programs.
5. 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.
6. 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.

If this petition is granted, URTA requests that copies of all notices and filings in this docket be served on:

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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 26th day of August, 2010.

Callister Nebeker & McCullough

Stephen F. Mecham

Certificate of Mailing

I hereby certify that on August 26, 2010 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. 10-2521-01 to be emailed to the following:

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