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Attorney for CenturyLink

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Consideration of the Role of Patronage when Determining Rate of Return, Affordable Base Rate, and Support from the Utah Universal Public Telecommunications Service Support Fund for Certain Telephone Corporations	Docket No. 11-2528-01 CENTURYLINK'S PETITION TO INTERVENE
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Pursuant to the Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7 and § 63-46b-9, Qwest Corporation (hereinafter referred to as “CenturyLink”¹) respectfully petitions to intervene in the above-referenced proceeding before the Public Service Commission of Utah (“Commission”). As grounds for such intervention, CenturyLink states that it has legal rights or interests that are or may be substantially affected by these proceedings, that there are facts which support this position detailed below, and that CenturyLink requests that it be allowed intervention.

In support of this Petition, CenturyLink states as follows:

1. CenturyLink is a provider of telecommunications service in Utah. As a telecommunication provider CenturyLink contributes to the Utah Universal Public Telecommunications Service Support fund (State USF Fund). In addition to contributing to the

¹ Effective August 8, 2011, Qwest Corporation will do business as CenturyLink.

State USF fund, CenturyLink as a Lifeline provider also receives money from the fund. As a participant in the State USF fund, CenturyLink desires to participate in this docket to monitor the proceedings to ensure that its involvement with the fund is not impacted as a result of any changes that may happen to the fund as a result of this proceeding examining the issue of patronage.

2. The June 27, 2011 Order in this docket requests that “any party entering an appearance shall file with the Commission a preliminary position statement addressing the issues to be treated in this proceeding.” CenturyLink does not intend to file a preliminary position statement, but instead will review the various positions of the parties to monitor the potential impact the various positions may have with respect to CenturyLink’s involvement with the State USF fund. CenturyLink will be prejudiced if it does not intervene, because if it reviews the positions of other parties, and determines its involvement in the state USF fund could be impacted, it would then not have an opportunity to participate and comment.

3. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing CenturyLink to intervene.

4. The name, address, and telephone number of the person to whom communications should be addressed is:

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WHEREFORE, for the reasons set forth above, CenturyLink requests that the Commission grant this timely petition to intervene and permit CenturyLink to participate in this

proceeding to the full extent allowed by the rules of the Commission and by Utah law.

RESPECTFULLY SUBMITTED this 27th day of July, 2011.

CENTURYLINK

A handwritten signature in cursive script that reads "Torry Somers".

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