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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of
Wholesale Carrier Services, Inc.
For a Certificate of Public Convenience and
Necessity to Provide Resold and Facilities-
Based Local Exchange Services within the
State of Utah

DOCKET NO. 11-2545-01

The Utah Rural Telecom Association (“URTA”), on behalf of itself and URTA members, All West Communications, Inc., Bear Lake Communications, Beehive Telephone Company, Carbon/Emery Telcom, Inc., Central Utah Telephone, Inc., Direct Communications Cedar Valley, Emery Telcom, Inc., Gunnison Telephone, Hanksville Telcom, Inc., Manti Telephone Company, Skyline Telecom, South Central Utah Telephone Association, Inc., UBTA-UBET Communications, Inc., and Union Telephone (“URTA members”) 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. As grounds for such intervention, URTA states that its members have 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 URTA requests that it be allowed intervention on behalf of its members.

In support of this Petition URTA states as follows:

1. URTA is a Utah non-profit corporation. URTA members are local exchange carriers providing public telecommunications services in Utah pursuant to certificates of public convenience and necessity issued by this Commission. The URTA members serve rural exchanges in the state with fewer than 5,000 access lines. Wholesale Carrier Services, Inc.'s ("WCS") Application for Certificate of Public Convenience and Necessity indicates that WCS's initial focus will be in the service territories of Qwest Corporation d/b/a CenturyLink QC and Citizens Telecommunications Company of Utah d/b/a Frontier Communications of Utah. The WCS Application does not indicate it is seeking its certificate only in those areas with more than 5,000 access lines. Therefore, URTA's interest in this proceeding is WCS's potential entry into a Frontier exchange with fewer than 5,000 access lines. To date, the Commission has not permitted such entry. To the extent this proceeding establishes precedent allowing applicants to enter rural exchanges with fewer than 5,000 access lines to provide telecommunications services, URTA and URTA members have a significant legal interest that may be substantially affected by the outcome.

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

3. URTA requests that copies of all notices, pleadings, filings, correspondence and discovery requests and responses 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 _____ day of January, 2012.

BLACKBURN & STOLL, LC

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CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the Motion to Intervene, Docket No. 11-2545-01 was sent to the following individuals by electronic mail, this _____ day of January, 2012.

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