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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE PETITION OF
TOTAL CALL MOBILE, INC. FOR
LIMITED DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER

DOCKET NO. 12-2561-01

The Utah Rural Telecom Association (“URTA”), on behalf of itself and URTA members, All West Communications, Inc., Bear Lake Communications, Carbon/Emery Telcom, Inc., Central Utah Telephone, Inc., Direct Communications Cedar Valley, Emery Telcom, Inc., Gunnison Telephone, Hanksville Telcom, Inc., Manti Telephone Company, Skyline Telcom, 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, including rural areas, 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. Total Call Mobile, Inc. (“Total Call”) is petitioning for limited designation as an eligible telecommunications carrier (“ETC”) to provide public telecommunications Lifeline Service in URTA members’ service territories, which include areas served by rural telephone companies.

4. Under 47 USC § 214(e)(2), the Commission must determine if such designation is in the public interest.

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

7. 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, URТА respectfully requests that the Commission enter an Order granting URТА's petition to intervene in this docket allowing URТА and URТА members to participate to the fullest extent allowed by law.

Dated this 12th day of December, 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. 12-2561-01 was sent to the following individuals by electronic mail, this 12th day of December, 2012.

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