



0000033988

ARIZONA CORPORATION COMMISSION

JAN 24 2001

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

Arizona Corporation Commission

DOCKETED

JAN 24 2001

DOCKETED BY 

IN THE MATTER OF MIDVALE TELEPHONE
EXCHANGE, INC.'S APPLICATION FOR
AUTHORITY TO INCREASE RATES AND FOR
DISBURSEMENT FROM THE ARIZONA USF

T-02532A-00-0512

**MOTION FOR LEAVE TO
INTERVENE**

In accordance with A.A.C. R14-3-105, Citizens Communications Companies ("Citizens") applies to the Arizona Corporation Commission for an order granting Citizens leave to intervene in the above-captioned docket. The Commission should grant Citizens leave to intervene in this matter because Citizens is directly and substantially affected by these proceedings. Both applicant Midvale Telephone Exchange, Inc. ("Midvale") and Commission Staff have no objection and agree that Citizens may intervene in this docket.

Applicant Midvale is seeking to increase local exchange rates. Further, Midvale has requested authority to provide extended area service from Midvale's Cascabel exchange to Qwest's Benson and San Manuel exchanges. Citizens recently purchased Qwest's Benson and part of Qwest's San Manuel exchanges. Midvale also has asked the Commission to authorize distribution from Arizona's Universal Service Fund. Under these circumstances, Midvale's application may affect Citizen's customers as well as impact the company's costs and revenues. Further, the Commission just recently approved Citizen's purchase of Qwest's telephone exchanges in Decision No. 63268 dated December 15, 2000. As such, Citizens is an interested party and should be granted intervention just like Qwest.

GALLAGHER & KENNEDY, P.A.
2575 E. CAMELBACK ROAD
PHOENIX, ARIZONA 85016-9225
(602) 530-8000

1 Under these circumstances, Citizens clearly has a substantial and direct interest in
2 the outcome of Midvale's application. Citizens didn't intervene in this docket earlier because it was
3 not aware of Midvale's application until just recently. Citizen's participation in this docket will not
4 unduly broaden the issues raised in the pending docket.

5 The name, address and telephone number of the person upon whom service of all
6 documents and materials should be made is:

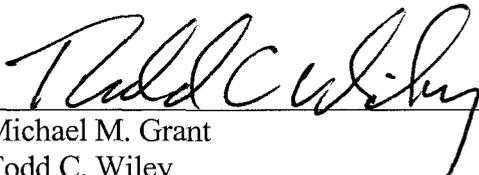
7 Michael M. Grant
8 Todd C. Wiley
9 Gallagher & Kennedy, P.A.
10 2575 East Camelback Road
11 Phoenix, Arizona 85016-9225
12 (602) 530-8291

13 Curt Huttzell, Ph.D.
14 Director, State Government Affairs
15 Citizens Communications Company
16 Suite 101
17 9672 South 700 East
18 Sandy, Utah 84070-3555
19 (801) 553-0091

20 For the reasons noted above, Citizens respectfully requests that the Hearing Officer
21 grant Citizens leave to intervene in this docket.

22 RESPECTFULLY SUBMITTED this 24 day of January, 2001.

23 GALLAGHER & KENNEDY, P.A.

24 By 
Michael M. Grant
Todd C. Wiley
2575 East Camelback Road
Phoenix, Arizona 85016-9225
Attorneys for Citizens Communications Companies

1 **Original** and ten (10) copies
of the foregoing document filed
2 this 21 day of January, 2001, with:

3 Docket Control
Arizona Corporation Commission
4 1200 West Washington
Phoenix, Arizona 85007

5
6 **Copy** of the foregoing document hand delivered
this 21 day of January, 2001, to:

7
8 Lyn Farmer, Chief Counsel
Arizona Corporation Commission
Legal Division
9 1200 West Washington
Phoenix, Arizona 85007

10
11 Deborah Scott
Director, Utilities Division
Arizona Corporation Commission
12 1200 West Washington
Phoenix, Arizona 85007

13
14 Hearing Division
Arizona Corporation Commission
1200 West Washington
15 Phoenix, Arizona 85007

16
17 **Copy** of the foregoing document
mailed this 21 day of January, 2001, to:

18 Lane Williams
Midvale Telephone Exchange, Inc.
19 2205 Keithley Creek Road
Post Office Box 7
20 Midvale, Idaho 83645

21 Conley E. Ward
Givens Pursley, LLP
22 Suite 200
277 North 6th Street
23 Boise, Idaho 83701

24

1 Tamara S. Herrera
Ryley Carlock & Applewhite
2 Suite 2700
101 North First Avenue
3 Phoenix, Arizona 85003

4 Don Reading
Ben Johnson Associates
5 1227 El Pelar
Boise, Idaho 83702

6 Timothy Berg
7 Fennemore Craig, P.C.
Suite 2600
8 3003 North Central Avenue
Phoenix, Arizona 85012

9
10 By Linda Maguire
3099-0050/898118

11
12
13
14
15
16
17
18
19
20
21
22
23
24