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AZ CORP COMMISSION
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7 Attorneys for Citizens Communications, Inc.

8 **BEFORE THE ARIZONA CORPORATION COMMISSION**

9 IN THE MATTER OF REVIEW AND
10 POSSIBLE REVISION OF ARIZONA
11 UNIVERSAL SERVICE FUND RULES.

DOCKET NO. RT-00000H-97-0137

MOTION TO INTERVENE

12 Citizens Communications Company, Navajo Communications Company, Inc., Citizens
13 Telecommunications Company of the White Mountains, Inc., d/b/a Frontier Communications
14 of the White Mountains and Citizens Utilities Rural Company, Inc, d/b/a Frontier Citizens
15 Utilities Rural, (collectively "Citizens"), hereby moves the Arizona Corporation Commission
16 ("Commission") pursuant to A.A.C. R14-3-105, to grant Citizens leave to intervene in the
17 above-captioned proceeding. In support hereof, Citizens states as follows:

18 1. Citizens is a public service corporation under the jurisdiction of the Commission
19 and provides telecommunication service to the State of Arizona.

20 2. Citizens is directly and substantially affected by the possible revision of the
21 Arizona Universal Service Fund rules at Article 12 of the Administrative Code.

22 3. Citizens' participation in this proceeding will not unduly broaden the nature or
23 scope of this proceeding. Citizens, like the Commission, desires to determine if the possible
24 revision of the Arizona Universal Service Fund. Service of all correspondence, documents
25 or pleadings should be made to counsel for Citizens as follows:

Arizona Corporation Commission

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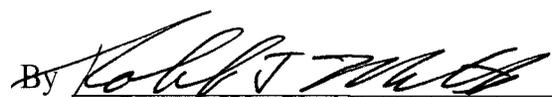
With a copy to:

Curt Huttsell, Ph.D.
Citizens Communications Company
4 Triad Center, suite 200
Salt Lake City, Utah 84180
(801) 924-6358 voice
(801) 924-6363 fax

WHEREFORE, for all of the foregoing reasons, Citizens respectfully requests that the Commission issue its order granting this Motion to Intervene.

RESPECTFULLY SUBMITTED this 21 day of May, 2002.

CHEIFETZ & IANNITELLI, P.C.

By 
Steven W. Cheifetz
Robert J. Metli
Attorneys for Citizens
Communications, Inc.

1 CERTIFICATE OF SERVICE

2 Original and eleven (11) copies of the
3 foregoing filed this ~~21st~~ day of
4 May, 2002, with the:

5 Arizona Corporation Commission
6 Docket Control Center
7 1200 West Washington Street
8 Phoenix, Arizona 85007-2996

9 Copies of the foregoing mailed
10 this ~~21st~~ day of May, 2002, to:

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