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BEFORE THE ARIZONA CORPORATION COMMISSION

2001 OCT 19 P 4: 17

WILLIAM A. MUNDELL  
CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
MARC SPITZER  
COMMISSIONER

AZ CORP COMMISSION  
DOCUMENT CONTROL

IN THE MATTER OF THE QWEST CORPORATION TARIFF FILING TO INTRODUCE A NEW RATE STRUCTURE FOR AN ACCESS SERVICE USED BY INTEREXCHANGE CARRIERS.

DOCKET NO. T-01051B-01-0391

**CITIZENS COMMUNICATIONS COMPANY'S MOTION TO INTERVENE IN ACCORDANCE WITH A.A.C. R-14-3-105**

Citizens Communications Company ("Citizens") moves to intervene in the above-captioned docket. Citizens should be granted intervention for the reasons set forth below.

Citizens is a telecommunications carrier with a Certificate of Convenience and Necessity to provide competitive and facilities based telecommunications services within the state of Arizona. Citizens interconnects with Qwest and is both a customer and competitor of Qwest. Citizens is directly and substantially affected by the outcome of this docket and the proposed tariff at issue in this docket. Citizens' participation in this docket will not unduly broaden the issues presented. Citizens is entitled to intervene pursuant to A.A.C. R14-3-105.

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

Michael M. Grant, Esq.  
Todd C. Wiley, Esq.  
Gallagher & Kennedy, P.A.  
2575 East Camelback Road  
Phoenix, Arizona 85016-9225

Arizona Corporation Commission

**DOCKETED**

OCT 19 2001

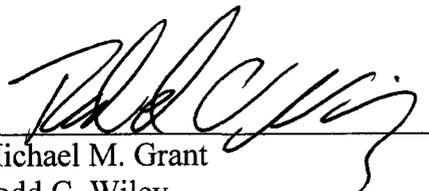
DOCKETED BY

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

1 For the reasons set forth above, Citizens respectfully requests that the  
2 Commission grant Citizens' motion to intervene in this docket and reject the Qwest tariff filing.

3 DATED this 19 day of October, 2001.

4 GALLAGHER & KENNEDY, P.A.

5  
6 By   
7 Michael M. Grant  
8 Todd C. Wiley  
9 2575 East Camelback Road  
10 Phoenix, Arizona 85016-9225  
11 Attorneys for Citizens Communications  
12 Company

10 **Original** and ten copies filed this  
11 19<sup>th</sup> day of October, 2001 with:

12 Docket Control  
13 Arizona Corporation Commission  
14 1200 West Washington  
15 Phoenix, Arizona 85007

16 **Copy** of the foregoing hand-delivered  
17 this 19<sup>th</sup> day of October, 2001 to:

18 Steve M. Olea  
19 Acting Director, Utilities Division  
20 Arizona Corporation Commission  
21 1200 West Washington Street  
22 Phoenix, Arizona 85007

23 Christopher C. Kempsey, Esq.  
24 Chief Counsel, Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Lyn Farmer, Chief Administrative Law Judge  
Hearing Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

1 Copy of the foregoing mailed  
this 19th day of October, 2001 to:

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