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2002 MAY 21 P 4: 18
AZ CORP COMMISSION
DOCUMENT CONTROL

Attorneys for Citizens Communications, Inc.

BEFORE THE ARIZONA CORPORATION COMMISSION

7 IN RE APPLICATION OF SMITH BAGLEY, DOCKET NO. T-02556A-01-0931
8 INC. FOR DESIGNATION AS AN
9 ELIGIBLE TELECOMMUNICATIONS
10 CARRIER UNDER 47 U.S.C. § 214(e)(2). **MOTION TO INTERVENE**

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

17 1. Navajo Communications Company, Inc. and Citizens Telecommunications
18 Company of the White Mountains are public service corporations and Local Exchange
19 Carriers providing service to the service area in Apache and Navajo Counties where Smith
20 Bagley, Inc. ("SBI") seeks designation as an Eligible Telecommunications Carrier ("ETC").

21 2. Citizens is directly and substantially affected by SBI's Application because
22 Citizens is designated as a rural carrier in the area SBI seeks designation as an ETC.

23 3. Citizens' participation in this proceeding will not unduly broaden the nature or
24 scope of this proceeding. Service of all correspondence, documents or pleadings should be
25 made to counsel for Citizens as follows:

Arizona Corporation Commission
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Robert J. Metli, Esq.
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With a copy to:

Curt Huttzell, 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:

11 Lynn Farmer, Chief Hearing Officer
12 Arizona Corporation Commission
13 1200 West Washington Street
14 Phoenix, Arizona 85007-2996

15 Chris Kempley, Chief Counsel
16 Legal Division
17 Arizona Corporation Commission
18 1200 West Washington Street
19 Phoenix, Arizona 85007-2996

20 Richard Boyles
21 Utilities Division
22 Arizona Corporation Commission
23 1200 West Washington Street
24 Phoenix, Arizona 85007-2996

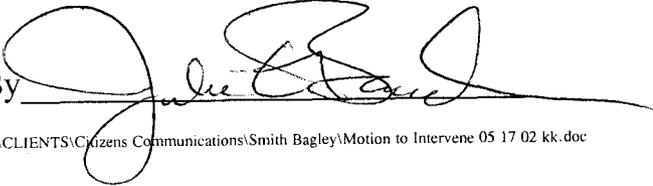
25 Jeffrey W. Crockett, Esq.
26 Jeffrey B. Guldner, Esq.
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