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INTERVENTION

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BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman
WILLIAM A. MUNDELL
Commissioner
JIM IRVIN
Commissioner
MIKE GLEASON
Commissioner
JEFF HATCH-MILLER
Commissioner

Arizona Corporation Commission

ARIZONA CORPORATION COMMISSION
DOCUMENT CONTROL

DOCKETED

JUL 30 2003

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IN THE MATTER OF THE APPLICATION
OF MIDVALE TELEPHONE EXCHANGE,
INC. FOR AN AMENDMENT TO ITS
CERTIFICATE OF CONVENIENCE AND
NECESSITY

Docket No. T-02532A-03-0017

**QWEST CORPORATION'S MOTION TO
INTERVENE**

Pursuant to Rule 14-3-105, Arizona Administrative Code, Qwest Corporation ("Qwest"), applies to this Arizona Corporation Commission for an order granting leave to intervene in the above-captioned proceeding.

The Commission should grant Qwest leave to intervene in this matter because Qwest is directly and substantially affected by these proceedings. On January 10, 2003, Midvale Telephone Exchange, Inc. ("Midvale") filed an application to extend its service territory to include parts of Poquito Valley in Prescott Valley, Arizona, including Section 11, T-15-N, R-1-W. This Section is the subject of consolidated complaints against Qwest before this Commission in Docket Nos. T-01051B-02-0535, T-01051B-02-0516 and T-01051B-02-0512.

The central issue in these complaints is whether Qwest may be forced to serve outside of service territory, particularly in light of Midvale's request to become the incumbent local exchange carrier for Section 11 as well as other Sections in the area. Additionally, the

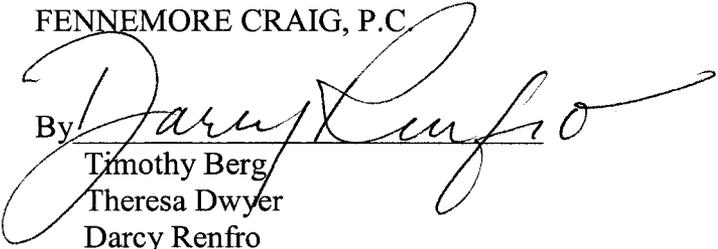
1 Commission joined Midvale in that proceeding. Staff issued data requests to both Qwest and
2 Midvale regarding the cost of service for each to the area and how the parties would interact
3 should Midvale's application be granted. Further, a hearing was held on the complaints against
4 Qwest on July 14-15, 2003, at which Midvale testified regarding its interest in serving Section 11
5 pursuant to its application. Under these circumstances, Qwest clearly has a substantial and direct
6 interest in the outcome of Midvale's application.
7

8 Finally, Qwest's participation in the proceeding will not unduly broaden the issues raised.
9 The name, address and telephone number of the person upon whom service of all documents is to
10 be made is:

11 Timothy Berg
12 FENNEMORE CRAIG, P.C.
13 3003 North Central Avenue
14 Suite 2600
15 Phoenix, Arizona 85012
16 (602) 916-5421

17 RESPECTFULLY SUBMITTED this 30th day of July, 2003.

18 FENNEMORE CRAIG, P.C.

19 By 
20 Timothy Berg

21 Theresa Dwyer

22 Darcy Renfro

23 3003 North Central, Suite 2600

24 Phoenix, Arizona 85012

25 *Attorneys for Qwest Corporation*

26 ORIGINAL +13 copies filed this
30th day of July, 2003:

27 Docket Control
28 ARIZONA CORPORATION COMMISSION
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30 Phoenix, AZ

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