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IDAHO PUBLIC  
UTILITIES COMMISSION

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Attorneys for Citizens Telecommunications Company of Idaho

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION  
OF NPCR, INC. d/b/a NEXTEL PARTNERS  
SEEKING DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER THAT  
MAY RECEIVE FEDERAL UNIVERSAL  
SERVICE SUPPORT

Case No. GNR-T-03-16

**PETITION TO INTERVENE**

COMES NOW Citizens Telecommunications Company of Idaho ("Citizens"), and respectfully petitions the Idaho Public Utilities Commission for leave to intervene in the above-captioned proceeding pursuant to Rules 71 through 75 of the Commission's Rules of Procedure for the following reasons:

1. Citizens is a corporation authorized to do and are doing business in the state of Idaho. Citizens is authorized to engage in the furnishing of local exchange and telecommunications services in Idaho.

2. Citizens desires to intervene in order that they might receive documents, and if its interests require, cross-examine witnesses and present evidence in Case No. GNR-T-03-16. The nature and quality of evidence that Citizens will introduce is dependent upon the nature and effect of other evidence in this proceeding. Consequently, Citizens cannot inform the Commission of how involved its individual participation in this proceeding will be. Therefore, Citizens cannot presently inform the Commission as to the type of evidence it will present, if any, or the length of time necessary for such presentation.

3. Citizens will be represented in this proceeding by:

Morgan W. Richards  
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4 Triad Center, Suite 200  
Salt Lake City, UT 84180  
Telephone: (801) 924-6357  
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Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided as noted above.

4. Without the opportunity to intervene herein, Citizens would be without any means to protect its interest in the outcome of this proceeding or to determine the impact of the Commission's determination on it.

5. Citizens requests the Commission grant this Petition to Intervene and allege that it has been timely filed. Citizens believes that intervention will not delay the proceedings nor prejudice the Commission or any party to the case.

WHEREFORE, Citizens requests that this Commission grant its timely Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

RESPECTFULLY SUBMITTED this 21<sup>ST</sup> day of May, 2003.

MOFFATT, THOMAS, BARRETT, ROCK &  
FIELDS, CHARTERED

By Morgan W. Richards  
Morgan W. Richards - Of the Firm  
Attorneys for Citizens

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 21<sup>st</sup> day of May, 2003, I caused to be served a true copy of the foregoing **PETITION TO INTERVENE** by the method indicated below.

Jean Jewell  
Idaho Public Utilities Commission  
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Boise, Idaho 83720-0074

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