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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorneys for Idaho Telephone Association  
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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IPUC RESPONSE TO  
FCC ORDER ON REVIEW OF SECTION 251  
UNBUNDLING OBLIGATIONS OF  
INCUMBENT LOCAL EXCHANGE  
CARRIERS (CC DOCKET NO. 01-338)

90-DAY REVIEW ON SWITCHING ON HIGH  
CAPACITY LOOPS

NINE-MONTH REVIEW ON ECONOMIC  
AND OPERATIONAL IMPAIRMENT  
REGARDING ACCESS TO SPECIFIC UNES

**IDAHO TELEPHONE  
ASSOCIATION'S PETITION TO  
INTERVENE**

**CASE NO. GNR-T-03-22**

**CASE NO. GNR-T-03-23**

The Idaho Telephone Association ("ITA") petitions this Commission for leave to intervene in the above entitled proceedings pursuant to Rules 72 and 73 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.072 and -.073. In support of this Petition, ITA states as follows:

1. The ITA is an association of independently owned telephone companies providing local exchange service and other telecommunications services within the state of Idaho. The ITA is charged with representing its member companies' interests before the Idaho Public Utilities Commission and other regulatory agencies.

2. The ITA requests leave to intervene in both of the above entitled proceedings. The ITA has a direct and substantial interest in these proceedings because this Commission's decision may, directly or indirectly, affect the ITA member companies' quality or cost of telecommunications service.

3. The ITA is unable to state its position at this stage of the proceedings, and therefore seeks to intervene for the purpose of receiving documents, examining witnesses, and otherwise participating as its interest may appear.

4. The ITA's representatives for the purpose of service of pleadings and other written materials are:

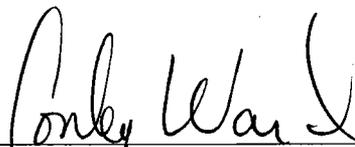
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5. This Petition has been filed after the deadline for intervention established in the Commission's Notice of State Proceeding and Notice of Right to Intervene. The ITA submits, however, that granting its Petition despite its late filing will not delay the proceedings or prejudice any party.

WHEREFORE, ITA respectfully requests that the Commission grant this Petition to Intervene and authorize ITA to participate in the above entitled proceedings with full rights as a formal party.

DATED this 7<sup>th</sup> day of July 2003.



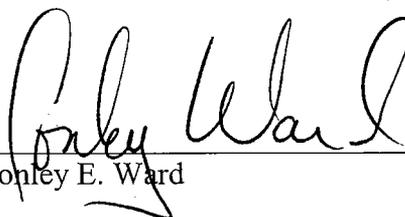
Conley Ward  
GIVENS PURSLEY LLP  
Attorneys for Idaho Telephone Association

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7<sup>th</sup> day of July 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Jean Jewell  
Idaho Public Utilities Commission  
472 W. Washington Street  
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Boise, ID 83720-0074  
 U.S. Mail  Fax  By Hand

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