



*Advisors to the Rural Communications Industry*

**Barry L. Hjort**

P.O. Box 15855 · Washington D.C. 20003-0855 · Ph: (303) 550-4772 · Email: rollsroyal@aol.com

September 11, 2006

Via Federal Express Overnight Delivery

Ms. Jean Jewel, Executive Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
PO Box 83720  
Boise, ID 83720-0074

Re: Case No. INC-T-06-02

Dear Ms. Jewel:

Enclosed please find the original and seven copies of the Petition to Intervene of the Potlatch Telephone Company, Inc. in the referenced matter as well as an original and seven copies of a Motion for Admission *Pro Hac Vice* in the same docket.

If you have questions concerning these filings, please contact me at (303) 550-4772.  
Thank you.

Very truly yours,

Barry L. Hjort  
Guillory & Hjort  
2111 West Boulevard  
Rapid City, SD 57701

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Morgan W. Richards, Jr.  
Bar No. 1913  
Richards Law Firm  
804 East Pennsylvania Lane  
Boise, Idaho 83706  
208-345-8371  
Email: [mwrlaw@cableone.net](mailto:mwrlaw@cableone.net)

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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF IDAHO**

IN THE MATTER OF THE PETITION )  
OF INLAND CELLULAR FOR )  
DESIGNATION AS ELIGIBLE )  
TELECOMMUNICATIONS CARRIERS )  
UNDER 47 U.S.C. SECTION 214(e)(2) )

Case No. INC-T-06-02

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**PETITION TO INTERVENE OF THE POTLATCH TELEPHONE  
COMPANY, INC.**

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Potlatch Telephone Company Inc., through its undersigned counsel, pursuant to Idaho Public Utility Commission (IPUC) Rule of Procedure 72 et seq., submits its Petition to Intervene in this matter and in support thereof states as follows:

1. Potlatch Telephone Company, Inc. ("Potlatch") is a certified provider of local exchange telephone service in the State of Idaho with its address for regulatory

contact purposes as follows: Gail Long, Manager, External Relations, TDS Telecom, PO Box 1566, Oregon City, OR 97045.

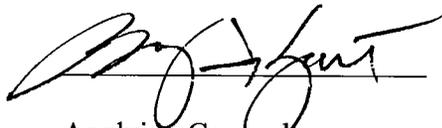
2. Potlatch has a direct and substantial interest in this proceeding. It is and has been certified by the IPUC as an Eligible Telecommunications Carrier (ETC) in its designated service area for the purpose of providing supported local exchange telecommunications service and receiving Federal Universal Service support. Potlatch is a “rural telecommunications carrier” as defined by the Federal Telecommunications Act of 1996. As such, it is a co-called “rural LEC.”
3. The Application of Inland Cellular Telephone Company (“Inland Cellular”) for designation as an ETC, filed on June 26, 2006 identifies Potlatch as an affected “rural LEC.” As is noted in paragraph 9 of the Application: “Inland Cellular’s service area encompasses the entire study areas of the rural LECs listed in Exhibit C....” Exhibit C to the Application identifies Potlatch as one of the rural LECs affected by the Application and lists the Potlatch wire centers of Juliaetta, Kendrick and Troy as being affected by the Inland Application.
4. Potlatch seeks intervention in this matter to advocate the application by the IPUC of those applicable provisions of federal law and this Commission’s IPUC’s rules concerning applications for designation as an ETC, and specifically those provisions relating to the public interest and the competitive entry by a Competitive Eligible Telecommunications Carrier (CETC) into the study areas of rural local exchange providers for the purpose of providing competitive and supported ETC services. Approval of its intervention will not unduly delay the proceeding.

5. Potlatch will be directly and substantially affected by this Commission's decision in this case. It seeks intervention in order to fully participate in the proceeding to protect the interest of itself and its customers and to ensure the continuing protection of the public interest. Potlatch requests that pleadings, notices and other filings be provided to its undersigned counsel in this docket. It additionally requests that such filings also be provided to:

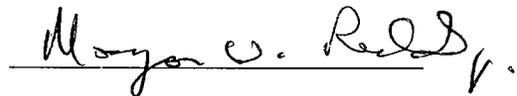
Gail Long, Manager, External Relations,  
TDS Telecom,  
PO Box 1566,  
Oregon City, OR 97045

WHEREFORE, Potlatch respectfully requests that the Commission approve its Petition to Intervene in this Docket.

DATED this 11<sup>TH</sup> day of September, 2006.



Applying Counsel  
Barry L. Hjort  
Guillory & Hjort  
2111 West Boulevard  
Rapid City, SD 57701  
303-550-4772



Local Counsel  
Morgan W. Richards, Jr.  
Richards Law Firm  
804 East Pennsylvania Lane  
Boise, Idaho 83706  
208-345-8371

**CERTIFICATE OF SERVICE**

I, Barry L. Hjort, hereby certify that I have, on this 11<sup>th</sup> day of September, 2006, served the foregoing **PETITION TO INTERVENE OF THE POTLATCH TELEPHONE COMPANY, INC.** upon all parties listed in the Certificate provided with the Inland Cellular Application. A copy of the foregoing **PETITION TO INTERVENE OF THE POTLATCH TELEPHONE COMPANY, INC.** filed today was placed in the United States mail, first class postage pre-paid, addressed to the following:

James K. Brooks, Treasurer/Controller  
Inland Cellular Telephone Company  
103 S. 2<sup>nd</sup> St., PO Box 688  
Roslyn, WA 98941

Ms. Jean Jewel, Executive Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
PO Box 83720  
Boise, ID 83720-0074

Nez Perce Tribal Executive Committee  
Rebecca Miles, Chairman  
ID  
P. O. Box 305  
Lapwai, ID 83540

Citizens Telecommunications  
DBA Frontier Communications of  
  
Ingo Henningson, Manager  
4 Triad Center, Suite 200  
Salt Lake City, UT 84180

Conley Ward, Esq.  
Givens Pursley LLP  
P. O. Box 2720  
Boise, ID 83701

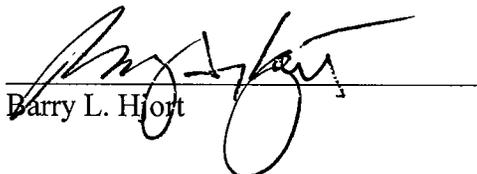
Qwest Corporation  
Theresa Jensen, Director-Regulatory  
1600 71<sup>st</sup> Avenue, Room 1806  
Seattle, WA 98191

The Coeur d'Alene Tribe  
Chief James Allen, Tribal Chairman  
850 A Street  
PO Box 408  
Plummer, ID 83851

Verizon Northwest, Inc.  
David Valdez, Vice President  
1800 41<sup>st</sup> Street  
P.O. Box 1003  
Everett, WA 98206

Inland Telephone Company  
Douglas Weis, President  
P.O. Box 171  
Roslyn, WA 98941

Gail Long, Manager External Affairs  
TDS Telecom  
PO Box 1566  
Oregon City, OR 97045

  
Barry L. Hjort