

Matilda Sanders

From: Brandl, Sandy [sandy.brandl@tdsmetro.com]
Sent: Friday, December 08, 2006 12:05 PM
To: Filings@psc.state.fl.us
Cc: Healy, Peter; Tom Mccabe
Subject: Docket No. 060582-TL, TDS Telecom's Petition to Intervene
Attachments: 060582-TL - TDS Petition to Intervene - 12.08.06.pdf

ORIGINAL

Filed on Behalf of:

Peter R. Healy
Regulatory & Legal Counsel
TDS Telecom
525 Junction Road
Madison, WI 53717
Telephone: 608-664-4117
Email: peter.healy@tdstelecom.com

Docket Number: 060582-TL

Title of Filing: TDS Telecom's Petition to Intervene

Filed on behalf of: TDS Telecom

Description: TDS Telecom's Petition to Intervene in Docket No. 060582-TL

<<060582-TL - TDS Petition to Intervene - 12.08.06.pdf>>

Sandy Brandl

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TDS Telecom
525 Junction Road
Madison, WI 53717
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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK



ORIGINAL

December 8, 2006

Ms. Blanca Bayó, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 060582-TL, Petition of Alltel Communications, Inc. for designation as eligible telecommunications carrier (ETC) in certain rural telephone company study areas located in Alltel's licensed area.

Dear Ms. Bayó:

Enclosed for filing on behalf of TDS Telecom is TDS Telecom's Petition to Intervene in Docket No. 060582-TL.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to contact me.

Very truly yours,

Peter R. Healy
Regulatory & Legal Counsel
TDS Telecom
525 Junction Road
Madison, WI 53717
peter.healy@tdstelecom.com

DOCUMENT NUMBER - DATE

11251 DEC-8 8

FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Alltel Communications, Inc. for
Designation as eligible telecommunications
Carrier (ETC) in certain rural telephone
Company study areas located entirely in
Alltel's licensed area.

Docket No. 060582-TL

Filed: December 8, 2006

PETITION TO INTERVENE

Pursuant to Commission Rule 25-22.039, Quincy Telephone Company d/b/a TDS Telecom ("TDS") respectfully requests the Commission to allow TDS to intervene in this proceeding. In support thereof TDS states as follows:

1. Petitioner's name and address are:

Quincy Telephone Company d/b/a TDS Telecom
525 Junction Road
Madison, WI 53717

2. All notices, pleadings, orders and documents in this proceeding should be provided to:

Peter R. Healy
Regulatory & Legal Counsel
TDS Telecom
525 Junction Road
Madison, WI 53717
Phone: 608-664-4117
Fax: 608-663-3030
peter.healy@tdstelecom.com

Tom McCabe
TDS Telecom
P.O. Box 189
Quincy, FL 32353-0189
thomas.mccabe@tdstelecom.com

3. TDS is an incumbent local exchange telecommunications company (ILEC) authorized by the Commission to provide local exchange service in the State of Florida.

DOCUMENT NUMBER-DATE

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4. The instant proceeding involves a request by Alltel Communications, Inc. (Alltel) for eligible telecommunications carrier (ETC) status to serve certain areas of the state where TDS operates as a rural ILEC under FCC rules. As set forth in the following paragraphs, TDS will be substantially affected by the actions the Commission may take on Alltel's Petition.

5. The federal law requires a public interest finding if a provider seeks ETC status in connection with service in an area served by a rural telephone company. 47 U.S.C. § 214(e)(2); 47 C.F.R. § 201(c); In addition, Section 214(e)(2) assigns the primary responsibility for making ETC designations to the state commissions. In particular, it provides the following guidelines regarding the designation of multiple ETCs in a given service area:

Upon request and consistent with the public interest, convenience, and necessity, the state commission may, in the case of an area served by a rural telephone company, and shall in the case of all other areas, designate more than one common carrier as an ETC...Before designating an additional ETC for an area served by a rural telephone company, the state commission shall find that the designation is in the public interest.¹

The proliferation of multiple ETC designations such as Alltel's request has resulted in an increase in the universal service high cost fund from approximately \$955 million in 1996 to over \$7 billion in 2006. The rapid growth in the universal service fund threatens the sustainability of the entire universal service system. TDS is a rural telephone company for purposes of ETC designation. See 47 U.S.C. § 153(37); 47 C.F.R. § 51.5; and as such relies on universal service support, it is without question that TDS would have a substantial interest in the designation of multiple ETCs in its serving area, particularly the "public interest" aspects of Section 214(e)(2) of the Telecommunications Act.

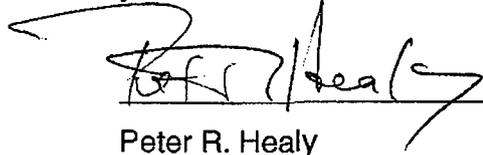
6. Universal service support is intended to help offset the cost of providing service in the highest cost, most remote and rural areas of the country. TDS fully understands that the Commission's role is to weigh the costs and benefits of granting Alltel's application, and respectfully requests to be allowed to participate in the discussion as an intervener in this proceeding.

¹ Communications Act of 1934, SS 214(e)(2)

7. No other party will adequately represent TDS' rights and interests in this matter.

WHEREFORE, TDS respectfully requests that the Commission grant this Petition and allow TDS to become a full party of record in this docket.

Respectfully submitted this 8th day of December, 2006.

A handwritten signature in black ink, appearing to read "Peter R. Healy", is written over a horizontal line. The signature is stylized and cursive.

Peter R. Healy
Quincy Telephone Company
d/b/a TDS Telecom Quincy Telephone
525 Junction Road
Madison, WI 53717
608-664-4117
608-663-3030
peter.healy@tdstelecom.com

CERTIFICATE OF SERVICE
DOCKET NO. 060582-TL

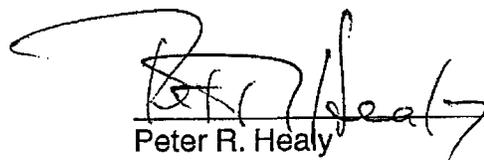
I HERBY CERTIFY that a true and correct copy of the foregoing was served by U.S.
Mail this 8th day of December, 2006 to the following:

Alltel Communications, Inc.
Stephen B. Rowell
One Allied Drive
Little Rock, AR 72202

Florida Public Service Commission
Adam Teitzman, Office of the General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Florida Public Service Commission
Robert Casey, Division of Competitive Markets & Enforcements
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Embarq Florida, Inc.
Susan S. Masterton
1313 Blair Stone Road
Tallahassee, FL 32301


Peter R. Healy