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July 10, 2006

Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48911

Re: In the matter, on the Commission's own motion, to examine the total service long-run incremental costs of the MICHIGAN EXCHANGE CARRIERS ASSOCIATION COMPANYS
MPSC Case No. U-14781

Dear Ms. Kunkle:

Enclosed for filing in the above-captioned matter is a Petition for Leave to Intervene of Alltel Communications, Inc. and a Proof of Service of the same.

If you have any questions, please contact my office.

Very truly yours,

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.



Mike
Ashton

Michael S. Ashton

Digitally signed by Mike Ashton
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Enclosures

cc: Mark Burzych
Michael Rampe
Haran Rashes
John J Reidy

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,	)	
to examine the total service long run incremental	)	
costs of the MICHIGAN EXCHANGE CARRIERS	)	Case No. U-14781
ASSOCIATION COMPANYS, including ACE	)	
TELEPHONE COMPANY, BARRY COUNTY	)	
TELEPHONE COMPANY, DEERFIELD	)	
FARMERS' TELEPHONE COMPANY, KALEVA	)	
TELEPHONE COMPANY, LENNON TELEPHONE	)	
COMPANY, OGDEN TELEPHONE COMPANY,	)	
PIGEON TELPEHONE COMPANY, the UPPER	)	
PENNINSULA TELEPHONE COMPANY, and	)	
WALDRON TELEPHONE COMPANY,	)	
_____	)	

PETITION FOR LEAVE TO INTERVENE OF ALLTEL COMMUNICATIONS, INC.

Alltel Communications, Inc. ("Alltel") by and through its legal counsel, Fraser Trebilcock Davis & Dunlap, P.C., and pursuant to Rule 201 of the Rules of Practice and Procedure before the Commission, hereby petitions the Michigan Public Service Commission for leave to intervene in the above-entitled proceeding. In support of its Petition, Alltel states:

PARTIES

1. Alltel is a Delaware company with is principal place of business located at One Allied Drive, Little Rock, Arkansas 72202-2177.
2. Alltel is a provider of commercial mobile radio service ("CMRS") in the State of Michigan.
3. The Michigan Exchange Carriers Association ("MECA") is an association of incumbent local exchange carriers that operate within the State of Michigan.

PURPOSE OF THIS COST PROCEEDING

4. On February 21, 2006, this Commission issued an order establishing this proceeding “to investigate and review the total service long run incremental costs” of the MECA companies and required the MECA companies to file documents and testimony by June 30, 2006, to support cost studies of their total service long run incremental costs. (February 21, 2006, Order at p. 19.)

COMMISSION STANDARD FOR GRANTING INTERVENTION

5. In deciding petitions for leave to intervene, such as this petition filed by Alltel, this Commission has repeatedly adopted the two-prong test for standing set forth in *Association of Data Processing Service Organizations, Inc. v Camp*, 397 US 150; 90 S. Ct. 827; 250 L.Ed. 184 (1970).

6. As set forth in *Association of Data Processing*, the two-prong test consists of a showing that: (1) the petitioner would likely suffer injury in fact (i.e., its interests are endangered or at issue); and (2) the petitioner’s interests that are allegedly endangered are within the zone of the interest to be protected or regulated by the statute under consideration.

7. Here, Alltel meets the Commission’s standing test.

8. In a separate docket - - Case No. U-14889, Alltel is currently engaged in an arbitration proceeding with many of the companies that comprise MECA. The MECA companies that are involved in this pending arbitration proceeding include: Ace Telephone Company, Allendale Telephone Company, Barry County Telephone Company, Blanchard Telephone Company, Bloomingdale Telephone Company, Chippewa County Telephone Company, Deerfield Farmers’ Telephone Company, Hiawatha Telephone Company, Kaleva Telephone Company, Midway Telephone Company, Ogden Telephone Company, Ontonagon Telephone

Company, Pigeon Telephone Company, the Upper Peninsula Telephone Company, Waldron Telephone Company, and Winn Telephone Company.

9. This pending arbitration involves two issues:

(1) What is the appropriate reciprocal compensation mechanism with respect to intraMTA traffic exchanged between the parties?

(2) If a rate of \$.00 or bill and keep is not required to continue, whether the rates that will be applicable retroactive to the agreed effective date of the new interconnection agreement, will be interim rates and subject to true up to the final rates that result in Commission Docket U-14781?

10. Because Alltel exchanges telephone calls with many of the MECA companies and is a party to this pending arbitration proceeding, Alltel meets the Commission's two-prong standing test.

11. Alltel meets the first prong of the standing test because its interests will be directly impacted by this case. As a CMRS provider in the geographic area where many of the MECA companies are incumbent local exchange carriers, Alltel is required pursuant to the federal Telecommunications Act of 1996 to "interconnect directly or indirectly with facilities and equipment of other telecommunications carriers" including the MECA companies. 47 U.S.C. § 251(a)(1). Alltel has an interest in this proceeding because it terminates local telephone calls to many of the MECA companies and is currently party to an arbitration proceeding to "establish reciprocal compensation arrangements for the transport and termination of telecommunications" pursuant to 47 U.S.C. § 251(b)(5).

12. If excessive or unlawful rates result from this proceeding, Alltel's interests will be harmed by having to pay those excessive rates.

13. Thus, the rates to be established in this proceeding and the inputs and methodology approved by this Commission to establish those rates in this cost proceeding will directly impact Alltel.

14. Alltel also meets the second prong of the Commission's standing test because its interests falls within the zone of interest to be protected or regulated by the statutes in question in this cost proceeding. Both the TSLRIC standard established by the Michigan Telecommunications Act ("MTA") and the Total Element Long Run Incremental Cost ("TELRIC") standard established by the federal Telecommunications Act of 1996 and the Federal Communications Commission are designed to protect providers, such as Alltel, that must transport and terminate calls on other providers' networks. MCL 484.2352(1); 47 U.S.C. § 252(d) and 47 C.F.R. 51.505(e).

15. As a result, Alltel meets the two prong test for standing and its petition for leave to intervene should be granted.

16. Further, no other party can adequately represent Alltel's interests in this proceeding.

17. Finally, if the Commission were to determine that Alltel does not have standing as a matter of right, then the Commission should grant Alltel permissive intervention. Alltel is in a position to provide useful information to the Commission in making a determination as to MECA companies cost studies.

WHEREFORE, Alltel Communications, Inc. respectfully requests that it be granted status to intervene as a party to this proceeding with full rights of participation.

Respectfully submitted,

ALLTEL COMMUNICATIONS, INC.

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Vice President Regulatory Legal Affairs
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Mike Ashton

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STATE OF MICHIGAN

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In the matter, on the Commission's own motion,)
to examine the total service long run incremental)
costs of the MICHIGAN EXCHANGE CARRIERS) Case No. U-14781
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TELEPHONE COMPANY, DEERFIELD)
FARMERS' TELEPHONE COMPANY, KALEVA)
TELEPHONE COMPANY, LENNON TELEPHONE)
COMPANY, OGDEN TELEPHONE COMPANY,)
PIGEON TELPEHONE COMPANY, the UPPER)
PENNINSULA TELEPHONE COMPANY, and)
WALDRON TELEPHONE COMPANY,)
_____)

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF INGHAM)

Debbie K. Lange, being first duly sworn, deposes and says that on this 10th day of July, 2006, she served a copy of Petition for Leave to Intervene of Alltel Communications, Inc. and Proof of Service for same on the individuals listed on the attached Service List by U.S. mail and by e-mail to the addresses listed on the attached service list.

Debbie K. Lange Digitally signed by Debbie K. Lange
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Fraser Trebilcock Davis & Dunlap, P.C.
Date: 2006.07.10 10:47:19 -04'00'

Debbie K. Lange

Subscribed and sworn to before me
on this 10th day of July, 2006

Jennifer Joy Yocum Digitally signed by Jennifer Joy Yocum
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O = Fraser Law Firm
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Jennifer Joy Yocum, Notary Public
Ingham County, Michigan
Acting in Ingham County
My Commission Expires: 12-17-2011

MPSC CASE NO. U-14781

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