

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Brian J. Moline, Chair
Robert E. Krehbiel
Michael C. Moffet

STATE CORPORATION COMMISSION

MAY 17 2006

In the Matter of the Joint Application of)
Rural Telephone Service Company, Inc.)
(RuralTel) and Gorham Telephone)
Company, Inc. (Gorham) for Permission)
of RuralTel to Cease Operating as a)
Telephone Public Utility in Two Kansas)
Exchanges it is Acquiring from United)
and to Grant Gorham a Certificate of)
Public Convenience for the Same Two)
Exchanges, and for Authority to Transfer)
Property, Plant and Equipment of)
RuralTel Located in the Two Exchanges)
to Gorham and Complete all Matters)
Incident to the Transfer.)

 Docket Room

Docket No. 06-GRHT-1095-COC

PETITION TO INTERVENE AND MOTION FOR PROTECTIVE ORDER

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and moves the Corporation Commission of the State of the Kansas ("Commission") for an Order permitting it to intervene in the above-captioned proceeding. In support of its petition and motion, CURB states and alleges as follows:

1. CURB is composed of five volunteer consumer advocate members and is statutorily authorized to represent the interests of Kansas residential and small commercial ratepayers in utility proceedings.
2. CURB's Consumer Counsel has been given the discretion to intervene and represent the interests of Kansas residential and small commercial ratepayers in any utility proceeding before the Commission under K.S.A. 66-1223 et seq.
3. On April 7, 2006, Rural Telephone Service Company, Inc. (RuralTel)

and Gorham Telephone Company, Inc. (Gorham) filed a joint application for permission of RuralTel to cease operating as a telephone public utility in two Kansas exchanges it is acquiring from United and to grant Gorham a certificate of public convenience for the same two exchanges, and for authority to transfer property, plant and equipment of RuralTel located in the two exchanges to Gorham and complete all matters incident to the transfer.

4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. The rates paid and the service received by those customers will or may be affected by any Commission order or activity in this proceeding.

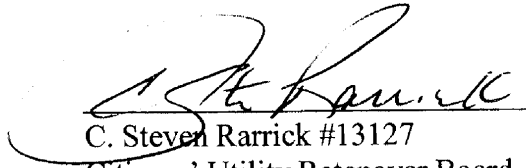
5. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

6. The residential and small commercial ratepayers whose interests CURB represents will or may be bound by any Commission order or activity in this proceeding and will or may be adversely affected thereby.

7. In the filing, the Transfer Agreement was filed as confidential information. CURB is requesting the Commission issue a Protective Order in this docket to allow CURB and its consultant access to the full information contained in this filing.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE Commission grant its Petition for Intervention and request for a Protective Order in this Docket.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Steven Rarrick", is written over a horizontal line. The signature is fluid and cursive.

C. Steven Rarrick #13127

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

Telephone: (785) 271-3200

Facsimile: (785) 271-3116

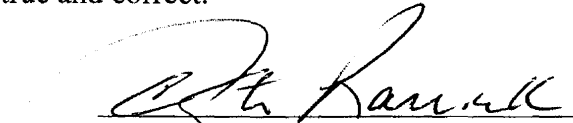
VERIFICATION

STATE OF KANSAS)

COUNTY OF SHAWNEE) ss:

I, C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

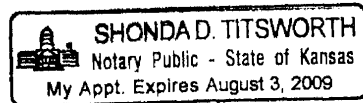
That he is an attorney for the Citizens' Utility Ratepayer Board, that he has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.


C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 17th day of May, 2006.


Notary Public

My Commission expires: 08-03-2009.



CERTIFICATE OF SERVICE

06-GRHT-1095-COC

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 18th day of May, 2006, to the following:

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**** Hand Deliver ****


C. Steven Rarrick