BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Cox)
Communications, LLĈ, to Expand its Service Area)
And for Designation as an Eligible)
Telecommunications Carrier in Certain Rural	Docket No. 15-CXKC-396-ETC
Territories in the State of Kansas)

PETITION OF WAMEGO TELECOMMUNICATIONS COMPANY, INC. FOR LEAVE TO INTERVENE. MOTION FOR ORDER ADOPTING A PROCEDURAL SCHEDULE AND MOTION FOR HEARING

COMES NOW Wamego Telecommunications Co., Inc. (hereafter "Wamego"), a Kansas corporation and telecommunications public utility, and requests leave to intervene as a party in the above-designated proceeding. Wamego further requests an Order of the Kansas Corporation Commission ("Commission") establishing a schedule for this proceeding, including provisions for discovery, prefiled testimony and evidentiary hearing. In support of thereof, Wamego states as follows:

- 1. Wamego is a rural telephone company as defined by KSA 66-1,187, an eligible telecommunications carrier for receipt of state and federal universal service support, and a carrier of last resort pursuant to KSA 66–2009.
- 2. Wamego is the incumbent provider of local exchange and exchange access in those Commission-defined exchange areas within which Cox Kansas Telcom, LLC (the "applicant" or "Cox") seeks authority to provide local exchange service.
- 3. This proceeding affects Wamego's rights and interests, and no other party is able sufficiently to protect those rights and interests.
- 4. The application of Cox in this proceeding appears to contain inconsistencies and unsupported conclusory assertions. As a result it is not clear from the application alone that the applicant is entitled to the relief sought.

- 5. Wamego is a contributor to the Kansas Universal Service Fund ("KUSF") and has an interest, on its own behalf and on behalf of its customers, in assuring that both contributions to and distributions from that fund are lawful and appropriate.
- 6. Wamego further has an interest, individually and together with the interests of all ratepayers, in assuring that actions of this Commission relating to the KUSF are made in a competitively neutral manner as by law provided.
- 7. The Commission should provide a reasonable opportunity for discovery as to the claims of the applicant.
- 8. The Commission should adopt a procedural schedule for consideration of the Cox application, including opportunity for discovery and submission by all interested interested parties of prefiled testimony, to be followed by an evidentiary hearing. Such action will increase assurance that Commission action on the Cox application it is lawful and in the public interest.

WHEREFORE Wamego requests: the Order of the Commission granting leave for Wamego's intervention as an interested party herein: adoption of a procedural schedule as discussed above; an Order for hearing in the above-entitled proceeding: and such other and further relief as may be just and equitable herein.

Respectfully submitted,

Thomas E. Gleason, Jr. #07741

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Attorney for Wamego

Telecommunications Company

VERIFICATION

STATE OF KANSAS)	CC.	
COUNTY OF DOUGLAS)	SS:	
state: I am attorney for Wamego T foregoing pleading, and upon info	lawful age, being first duly sworn upon my oath, elecommunications Co., Inc.; I have read the rmation and belief state that the matters therein he best of my knowledge and information.	
	Mornino Elland Thomas E. Gleason, Jr.	
Subscribed and sworn to be	fore me this day of 2015.	
	Kltwakchatur Notary Public	
My Commission Expires:		
9/13/15	STATE OF KANSAS My Appt. Exp. 9/13/15	

CERTIFICATE OF MAILING

Thomas E. Gleason, Jr. certifies that the foregoing pleading was served by mailing a copy thereof to the following on the 17th day of March, 2015:

Susan B. Cunningham DENTONS US LLP 7028 SW 69 h Street Auburn, KS 66402

Thomas E. Gleason, Jr