

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

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

NOV 02 2005

Steven Lauffen Docket Room

In the Matter of a General Investigation)
Addressing Requirements for Designation) Docket No. 06-GIMT-446-GIT
of Eligible Telecommunications Carriers.)

PETITION TO INTERVENE

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, 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 October 26, 2005, the Commission issued an order opening docket and requesting comments in a general investigation addressing requirements for designation of eligible telecommunications carriers.

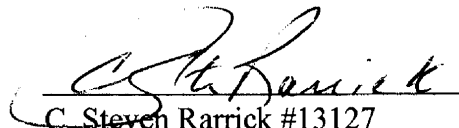
4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. The rates paid and the service received by those customers will or may be affected by any Commission order or activity in this proceeding.

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.

WHEREFORE, CURB respectfully requests the Commission grant its Petition for Intervention in this Docket.

Respectfully submitted,



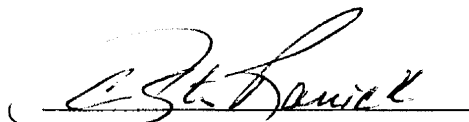
C. Steven Rarrick #13127
David Springe #15619
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

VERIFICATION


STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

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

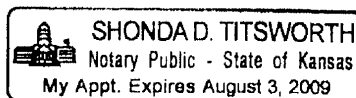
That he is an attorney for the Citizens' Utility Ratepayer Board; that he has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.


C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 2nd day of November, 2005.


Notary Public

My Commission expires: 8-03-2009



CERTIFICATE OF SERVICE

06-GIMT-446-GIT

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 2nd day of November, 2005, to the following:

EVA POWERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
Fax: 785-271-3354
e.powers@kcc.state.ks.us
**** Hand Deliver ****

BRUCE A. NEY, ATTORNEY
SOUTHWESTERN BELL TELEPHONE CO.
D/B/A SBC
220 EAST SIXTH STREET
TOPEKA, KS 66603
Fax: 785-276-1948
bruce.ney@sbc.com

TIMOTHY S. PICKERING, GENERAL COUNSEL
SOUTHWESTERN BELL TELEPHONE CO.
D/B/A SBC
220 EAST SIXTH STREET
TOPEKA, KS 66603
Fax: 785-276-1948
tp1481@sbc.com

MELANIE N. SAWYER, ATTORNEY
SOUTHWESTERN BELL TELEPHONE CO.
D/B/A SBC
220 EAST SIXTH STREET
TOPEKA, KS 66603
Fax: 785-276-1948
ms3765@sbc.com


C. Steven Rarrick