

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

In the Matter of the General Investigation into            )  
Interconnection, Porting, Evolving Technology,        )  
and the Impacts on Consumer Choices in Kansas.        )       Docket No. 20-GIMT-387-GIT

**PETITION TO INTERVENE OF GOBROLLY**

COMES NOW Brolly Communications, Inc. (dba as GoBrolly.com) and moves the State Corporation Commission of the State of Kansas (“Commission”) for an order permitting it to intervene in the above-captioned matter pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support thereof, Brolly Communications, Inc. states as follows:

1. On March 12, 2020, the Commission issued its *Order Opening General Investigation into Interconnection, Porting, Evolving Technology, and the Impact on Consumer Choices in Kansas* in the above docket. The investigation will focus on many issues concerning the provisioning of telecommunications services and facilities in Kansas, including the use of other providers’ facilities to transit traffic, porting and call completion, the role of VoIP technology and barriers to entry to competition.<sup>1</sup>

2. Brolly Communications, Inc. is a corporation duly organized under the laws of the State of Kansas, with its principal place of business at 1007 W. Amity, Louisburg, Kansas, 66053. Brolly Communications, Inc. is authorized to do business and is conducting business in the State of Kansas.

3. Brolly Communications, Inc. is an internet service provider in the State of Kansas who uses, or attempts to use, the facilities of LECs and telecommunications providers. Accordingly, Brolly Communications, Inc. requests permission to intervene herein for the

purpose of participating in the docket to ensure its input is received, and that its position, interests, and the interests of its Customers are adequately represented and considered. The existing parties to this docket are not similar to Brolly Communications, Inc., but even if they were, intervention should be allowed in a generic investigation such as this one as to any entity with an interest in the issues to be addressed. Pursuant to K.S.A. 77-521, Brolly Communications, Inc. qualifies as an intervener because its rights, duties, privileges, immunities, or other legal interests may be substantially affected by this proceeding.

4. Brolly Communications, Inc. agrees to accept the existing procedural schedule if its intervention is granted. In addition, Brolly Communications, Inc. agrees to accept electronic service, as stated by the Commission in its March 12, 2020 Order. As such, granting intervention and party status to Brolly Communications, Inc. at this time will not impede the progress of the docket or impact its present status.

5. All pleadings, orders, notices or other documents should be served on the following individual:

Rick Wagner, CEO  
1007 W. Amity  
PO Box 806  
Louisburg, KS 66053  
[ceo@gobrolly.com](mailto:ceo@gobrolly.com)

WHEREFORE, Brolly Communications, Inc. requests that the Commission issue an order allowing it to intervene and participate fully in this docket, including but not limited to the right to conduct discovery, file pleadings and testimony, present oral argument, and fully participate in any scheduled hearings, and for such further and other relief as may be appropriate.

Respectfully submitted,

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<sup>1</sup> March 12, 2020 Order, ¶21.



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8 S. Broadway  
PO Box 806  
Louisburg, KS 66053  
(913)837-4678  
[ceo@gobrollly.com](mailto:ceo@gobrollly.com)

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on this 6<sup>th</sup> day of April, 2020, a true and correct copy of the above and foregoing Petition to Intervene of GoBrollly was electronically served, hand-delivered or mailed, postage prepaid, to the below-named individuals:

Terri Pemberton, Chief Litigation Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, Ks. 66606  
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CEO, GOBROLLY

