

COLLEEN R. JAMISON
JAMISON LAW, LLC

March 29, 2019

Lynn M. Retz, Secretary
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604

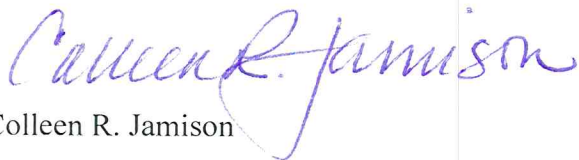
RE: Petition to Intervene
State Independent Alliance
Docket No. 19-WTCT-393-COM

Dear Ms. Retz:

Attached for filing please find a Petition to Intervene on behalf of the companies identified in Attachment A.

If you have any questions, please don't hesitate to let me know.

Cordially yours,



Colleen R. Jamison

Encl.

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Complaint of)	
Ideatek Telcom, LLC (Complainant))	
Against Wamego Telecommunications)	
Company, Inc., (Respondent) to)	Docket No. 19-WTCT-393-COM
Require Wamego to (1) Port)	
Customers and (2) Refrain from)	
Taking Any Action that Could Result)	
in the Blocking of Customer Calls.)	

PETITION TO INTERVENE OF THE STATE INDEPENDENT ALLIANCE

COME NOW the rural local exchange carriers ("RLECs") identified on Attachment "A" hereto and petition the Commission for permission to intervene in the above-captioned matter pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support, the RLECs show the Commission as follows:

1. The RLECs identified on Attachment A are all rural telephone companies as defined in K.S.A. 66-1,187(l), have all elected traditional rate of return regulation pursuant to K.S.A. 66-2005(b), and are all statutorily designated as carriers of last resort, pursuant to K.S.A. 66-2009(b).

2. The RLECs are, pursuant to K.S.A. 77-521(a), entitled to intervention for the reasons set forth below. K.S.A. 77-521(a) states:

The presiding officer shall grant a petition for intervention if:

- (1) The petition is submitted in writing to the presiding officer, with copies served upon all parties named in the presiding officer's notice of the hearing, at least three business days before the hearing;
- (2) the petition states facts demonstrating that the petitioner's legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervener under any provision of law; and
- (3) the presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

3. The RLECs are also entitled to intervention pursuant to K.A.R. 82-1-225(a), which substantially mirrors K.S.A. 77-521, also for the reasons set forth below.

4. This Complaint appears to be substantially similar to the Complaint filed by the Complainant against another rural local exchange carrier in Docket No. 19-RRLT-277-COM. As noted by the appointed hearing examiner at paragraph 10 of his February 1, 2019, Order in that docket: “[t]he parties have raised some practical and policy oriented issues involving VoIP service in a rural telephone company exchange.” Paragraph 10 of the Examiner’s Order continued on to pose ten policy questions any one of which have the potential to affect each RLEC petitioning for intervention.

5. As a result of the policy questions posed but not resolved in Docket No. 19-RRLT-277-COM, or the same or similar policy questions which may arise during the pendency of this action, the legal rights and duties of the petitioning RLECs including but not limited to interconnection, the exchange of traffic, and the porting of numbers, may be substantially affected by this proceeding. Any determinations made in this proceeding have the potential to affect all other RLECs in the state. As such, the petitioning RLECs should be granted intervention as of right.

6. This matter is in its infancy and, as a result, the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

WHEREFORE, for the reasons stated above, the RLECs identified in Attachment A request the Commission grant its petition to intervene in this matter and allow them to participate fully, and for such other and further relief as the Commission deems just and equitable.

Respectfully submitted,

JAMISON LAW, LLC



Colleen R. Jamison, KS Bar #16121

P.O. Box 128

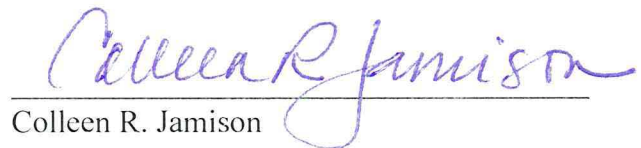
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VERIFICATION

I, the undersigned, hereby certify under penalty of perjury pursuant to K.S.A. 53-601 that I am an attorney for the rural local exchange carriers listed in attachment A hereto and that the foregoing is true and correct. Executed on March 29, 2019.


Colleen R. Jamison

CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the above and foregoing Petition to Intervene was served via electronic service this 29th day of March 2019, to the following:

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Colleen R. Jamison

ATTACHMENT A

Blue Valley Tele-communications, Inc.
Craw-Kan Telephone Cooperative, Inc.
Golden Belt Telephone Association, Inc.
Haviland Telephone Company, Inc.
JBN Telephone Company, Inc.
KanOkla Telephone Association
Madison Telephone, LLC
MoKan Dial, Inc.
Peoples Telecommunications, LLC
The Pioneer Telephone Association, Inc.
Rainbow Telecommunications Association, Inc.
S&A Telephone Company, Inc.
The S&T Telephone Cooperative Association, Inc.
South Central Telephone Association, Inc.
The Tri-County Telephone Association, Inc.
United Telephone Association, Inc.