



2. Each of the Petitioners has rights and responsibilities under state and federal statutes and administrative regulations regarding communications traffic originating or terminating beyond the Petitioner's network.

3. This proceeding asserts rights of one or more other parties that would, if approved, require a rural telephone company situated similarly to the Petitioners to perform certain acts and incur certain costs without provision for reasonable compensation. At least to that extent the issues in this proceeding affect the property rights and interests of each of the Petitioners.

4. The Examiner Order on Request for Expedited Review and Other Procedural Rulings ("Examiner Order"), issued February 1, 2019, herein, sets forth a non-exclusive list of some ten "issue[s] that may be considered in this docket." Resolution of those issues by the Commission would directly affect the interests of these petitioners in their discharge of public utility service responsibilities under statute and regulatory requirements. Such resolution would be likely to be applied to one or more of the petitioners subsequently upon any later request by the Complainant or an entity similarly situated to the Complainant; thus the Petitioners should be heard on any of all of such issues herein as well as on any other issue identified or raised by any party to this proceeding.

5. The Examiner Order also denies the complainant's request for expedited review under K.A.R. 82-1-220a, finding that the matter is "best resolved under K.A.R. 82-1-220, especially given the nature of the dispute and the complexity of the issues, making an expedited resolution impractical."

6. Each of the Petitioners 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

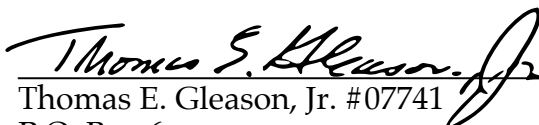
appropriate. Any determination herein that would require imposition of new costs on a Petitioner could become an expense recoverable from the KUSF.

7. Each of the Petitioners further has an interest, individually and together with the interests of all ratepayers, in assuring that actions of this Commission that may relate to the KUSF and/or to competitive provision of telecommunications service are made in a competitively neutral manner as by law provided.

8. No other party hereto is able effectively and fully to protect the interests of the Petitioners that are, or may become, at issue herein.

WHEREFORE Columbus requests the Order of the Commission granting leave for intervention by the Petitioners collectively and individually as interested parties herein.

Respectfully submitted,

  
Thomas E. Gleason, Jr. #07741

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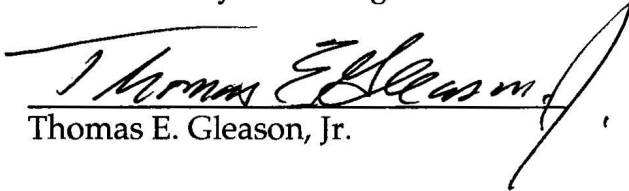
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**VERIFICATION**

STATE OF KANSAS                    )  
  ) ss:  
COUNTY OF DOUGLAS            )

I, Thomas E. Gleason, Jr., of lawful age, being first duly sworn upon my oath, state: I am attorney for the Independent Telecommunications Group, Columbus *et al.*; I have read the foregoing Petition, and upon information and belief state that the matters therein appearing are true and correct to the best of my knowledge and information.

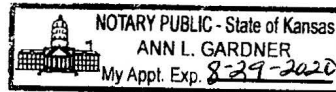
  
Thomas E. Gleason, Jr.

Subscribed and sworn to before me this 11th day of February 2019.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

8-29-2020



**CERTIFICATE OF MAILING**

Thomas E. Gleason, Jr. certifies that the foregoing Petition was served by electronic delivery of a correct copy thereof to the following on the 11th day of February, 2019:

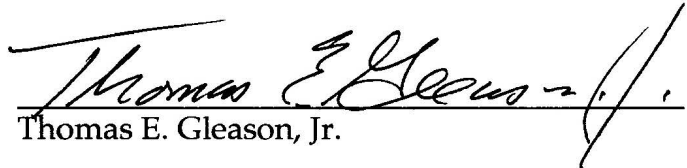
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