

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

In the Matter of the Complaint of Ideatek)
Telecom, LLC Against Nex-Tech and Rural)
Telephone Service Company Regarding) Docket No. 19-RRLT-277-COM
Disconnection of Service, Request for Interim)
Ruling and Request for Expedited Review)

**PETITION OF INDEPENDENT TELECOMMUNICATIONS GROUP,
COLUMBUS ET AL., FOR LEAVE TO INTERVENE**

COMES NOW the Independent Telecommunications Group, Columbus *et al.*,
(hereafter “Columbus” or “Petitioners”), consisting of the following Kansas
telecommunications carriers:

Columbus Communications Services LLC	Moundridge Telephone Company, Inc.
Cunningham Telephone Company, Inc.	Totah Communications, Inc.
Gorham Telephone Company, Inc.	Twin Valley Telephone, Inc.
H&B Communications, Inc.	Wamego Telecommunications Company, Inc.
Home Telephone Company, Inc.	Wilson Telephone Company, Inc.
LaHarpe Telephone Company, Inc.	Zenda Telephone Company, Inc.

and requests leave to intervene, individually and as a group, as parties in the above-
designated proceeding. In support of thereof, Columbus states as follows:

1. Each of the Petitioners is a rural telephone company as defined by K.S.A 66-1,187(1), an Eligible Telecommunications Carrier designated by this Commission for receipt of state and federal universal service support, and a carrier of last resort pursuant to KSA 66–2009. Each holds one or more certificates of convenience and authority from this Commission to provide local exchange and exchange access services in respective service areas defined by this Commission within the State of Kansas.

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
P.O. Box 6
Lawrence, KS 66044
(785) 842-6800 ph
(785) 856-6800 fax
gleason@sunflower.com



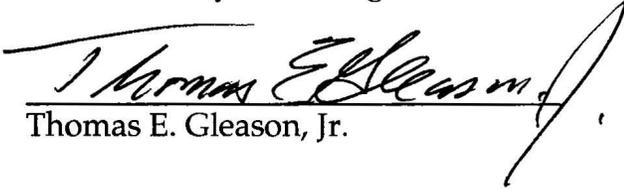
Mark Doty #14526
P.O. Box 490
Ottawa, KS 66067
(785) 242-3775 ph
(785) 242-3855 fax
doty.mark@gmail.com

GLEASON & DOTY, CHARTERED
Attorneys for Independent
Telecommunications Group, Columbus *et al.*

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.

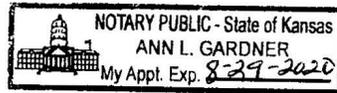
Subscribed and sworn to before me this 11th day of February 2019.



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:

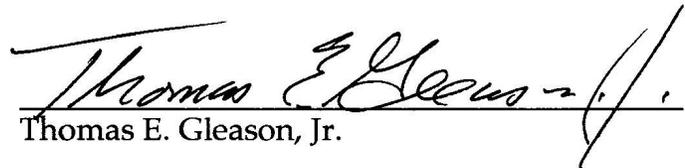
GLENDА CAFER, ATTORNEY
CAFER PEMBERTON LLC
3321 SW 6TH ST
TOPEKA, KS 66606
glenda@caferlaw.com

TERRI PEMBERTON, ATTORNEY
CAFER PEMBERTON LLC
3321 SW 6TH ST
TOPEKA, KS 66606
terri@caferlaw.com

WALKER HENDRIX, HEARING EXAMINER
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
w.hendrix@kcc.ks.gov

MICHAEL NEELEY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
m.neeley@kcc.ks.gov

MARK E. CAPLINGER
MARK E. CAPLINGER, P.A.
7936 SW INDIAN WOODS PL
TOPEKA, KS 66615-1421
mark@caplingerlaw.net


Thomas E. Gleason, Jr.