

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

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

**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"), which for the purpose of this matter consists of  
the following Kansas telecommunications carriers:

Columbus Communications Services LLC	Moundridge Telephone Company, Inc.
Cunningham Telephone Company, Inc.	Total Communications, Inc.
Gorham Telephone Company, Inc.	Twin Valley Telephone, Inc.
H&B Communications, Inc.	Wilson Telephone Company, Inc.
Home Telephone Company, Inc.	Zenda Telephone Company, Inc.
LaHarpe 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(l), 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. This proceeding involves factual circumstances and issues which are virtually identical to those in the Commission's Docket 19-RRLT-277-COM. In that proceeding the Examiner Order on Request for Expedited Review and Other Procedural Rulings ("Examiner Order"), issued February 1, 2019, set forth a non-exclusive list of some ten "issue[s] that may be considered in this docket." These issues are applicable as well in this proceeding and 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 in 19-RRLT-277-COM also denied 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." Similar concerns and complexities are likely to arise in this docket; therefore expedited treatment would

not be appropriate and would not afford these Petitioners a full opportunity to be heard and to assert their interests.

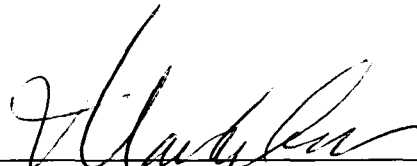
6. Each of the Petitioners is a contributor to the Kansas Universal Service Fund ("KUSF") and has an interest, on its own behalf and on behalf of its customers, in assuring that both contributions to and distributions from that fund are lawful and appropriate. Any determination herein that would require 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,



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GLEASON & DOTY, CHARTERED

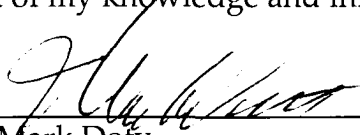
Attorney for Independent

Telecommunications Group, Columbus *et al.*

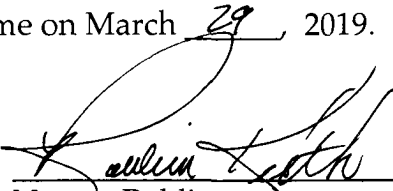
**VERIFICATION**

STATE OF KANSAS                    )  
  ) ss:  
COUNTY OF FRANKLIN            )

I, Mark Doty, 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.

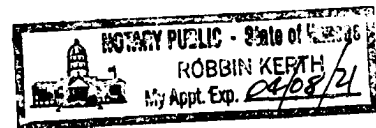
  
\_\_\_\_\_  
Mark Doty

Subscribed and sworn to before me on March 29, 2019.

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

My Commission Expires:

04/18/2021



**CERTIFICATE OF DELIVERY**

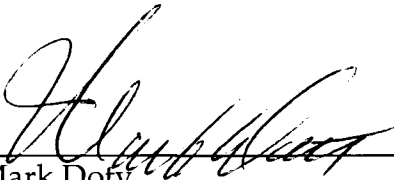
Mark Doty certifies that the foregoing Petition was served by electronic delivery of a correct copy thereof to the following on March 29, 2019.

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