

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners:

Brian J. Moline, Chair  
Robert E. Krehbiel, Commissioner  
Michael C. Moffet, Commissioner

STATE CORPORATION COMMISSION

MAR 10 2006

In the Matter of the Joint Application of United )  
Telephone Company of Kansas, Inc., United )  
Telephone Company of Eastern Kansas, Inc. )  
(United) and Rural Telephone Service Company, )  
Inc. (RuralTel) for Permission of United to Cease )  
operating as a Telephone Public Utility in Twelve )  
of its Kansas Exchanges, to Grant RuralTel a )  
Certificate of Public Convenience for the Same )  
Twelve Exchanges, and for Authority to Transfer )  
Property, Plant and Equipment of United Located )  
in the Twelve Exchanges to RuralTel and )  
Complete All Matters Incident to the Transfer. )

Docket No. 06-UTDT-962-CCS

 Docket Room

**PETITION TO INTERVENE AND MOTION FOR PROTECTIVE ORDER**

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and moves the Corporation Commission of the State of the Kansas ("Commission") for an Order permitting it to intervene in the above-captioned proceeding and for issuance of a Protective Order allowing CURB and its consultant access to confidential information filed herein. In support of its petition and motion, CURB states and alleges as follows:

1. CURB is composed of five volunteer consumer advocate members and is statutorily authorized to represent the interests of Kansas residential and small commercial ratepayers in utility proceedings.

2. CURB's Consumer Counsel has been given the discretion to intervene and represent the interests of Kansas residential and small commercial ratepayers in any utility proceeding before the Commission under K.S.A. 66-1223 et seq.

3. On March 3, 2006, United Telephone Company of Kansas, Inc., United

Telephone Company of Eastern Kansas, Inc. (United) and Rural Telephone Service Company, Inc. (RuralTel) jointly filed an application for permission of United to cease operating as a Telephone Public Utility in twelve of its Kansas exchanges, to grant RuralTel a Certificate of Public Convenience for the same twelve exchanges, and for authority to transfer property, plant and equipment of United located in the twelve exchanges to RuralTel and complete all matters incident to the transfer.

4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. The service received by those customers will or may be affected by any Commission order or activity in this proceeding.

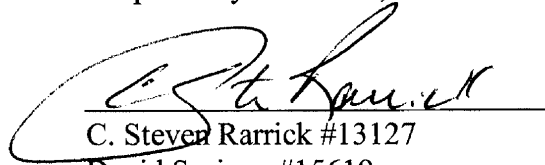
5. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

6. The residential and small commercial ratepayers whose interests CURB represents will or may be bound by any Commission order or activity in this proceeding and will or may be adversely affected thereby.

7. In the joint filing, the application and the Transfer Agreement between United Telephone Company of Kansas, Inc., United Telephone Company of Eastern Kansas, Inc. (United) and Rural Telephone Company, Inc. (RuralTel) was filed as confidential. CURB is requesting the Commission issue a Protective Order in this docket to allow CURB and its consultant access to the full information contained in this filing.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE Commission grant its Petition for Intervention and request for a Protective Order in this Docket.

Respectfully submitted,



C. Steven Rarrick #13127

David Springe #15619

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

(785) 271-3200

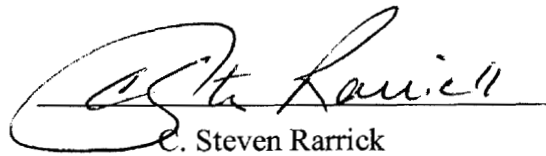
(785) 271-3116 Fax

VERIFICATION


STATE OF KANSAS        )  
                                  )  
COUNTY OF SHAWNEE    )     ss:

I, C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

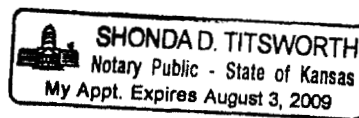
That he is an attorney for the Citizens' Utility Ratepayer Board; that he has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.

  
C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 10th day of March, 2006.

  
Notary Public

My Commission expires: 8-03-2009.



**CERTIFICATE OF SERVICE**

06-UTDT-962-CCS


I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 13th day of March, 2006, to the following:

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C. Steven Rarrick