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May 15, 2006

FILED ELECTRONICALLY
HAND DELIVERED ORIGINAL

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Re: Hargray & Bluffton EAS Docket
Docket No. 2005-204-C and 2006-99-C
Our File No. 19336-0017

Dear Mr. Terreni:

Enclosed for filing please find the Petition to Intervene on behalf of the South Carolina Cable Television Association in the Petition of Bluffton Telephone Company and Hargray Telephone Company to Implement EAS which the Commission has combined with Docket No. 2005-204-C. By copy of this letter we are serving the same on all parties of record. Please stamp the extra copy provided as proof of filing and return it with our courier.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/bds
Enclosure

cc: All Parties of Record
Ms. Nancy Horne

THIS DOCUMENT IS AN EXACT DUPLCIATE, WITH THE EXCEPTION OF THE FORM OF THE SIGNATURE, OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NOS. 2005-204-C and 2006-99-C

In Re: **Docket No. 2005-204-C** – Request for Extended Calling Area from Bluffton/Sun City Hilton Head Area to Hilton Head Island AND **Docket No. 2006-99-C** – Petition of Bluffton Telephone Company and Hargray Telephone Company to Implement Extended Area Service (EAS)	)	**PETITION TO INTERVENE ON BEHALF OF SOUTH CAROLINA CABLE TELEVISION ASSOCIATION**

The South Carolina Cable Television Association ("SCCTA") hereby petitions the Public Service Commission of South Carolina ("Commission") pursuant to 26 S.C. Regs. 103-836 and other applicable rules and regulations for permission to intervene in the above captioned proceeding. In support of this petition, SCCTA would show the following:

1. SCCTA is a nonprofit corporation, organized and existing pursuant to the laws of the State of South Carolina, representing fifteen companies serving 461 communities within South Carolina.

2. SCCTA's authorized representatives in this proceeding are as follows:

SCCTA OFFICIAL

Ms. Nancy Horne
South Carolina Cable Television Association
6175 Barfield Road, Suite 200
Atlanta, Georgia 30328

and

LEGAL REPRESENTATIVES

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
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3. Bluffton Telephone Company ("Bluffton") and Hargray Telephone Company ("Hargray") have submitted a request to the Commission which has been characterized as seeking approval of an EAS arrangement. In fact, the proposal would allow Hargray and Bluffton to bundle basic local service with a toll service while treating the resulting bundled service as if it were basic local service.

4. SCCTA has an interest in the above-caption proceeding inasmuch as SCCTA's members are potential providers and providers of competitive local exchange services in South Carolina and in the areas served by Bluffton and Hargray. SCCTA's position in this matter is that Bluffton and Hargray should not receive state universal service fund support for any new product that merges a toll service offering with a basic local exchange service offering. S.C. Code Section 58-9-280 provides for support of basic local service on a per line basis. The Commission should not allow the merger of toll and local services into a new expanded EAS and/or MEAS offering which Hargray and Bluffton can then characterize as "basic local service" in order to receive the same universal service fund support in the future.

SCCTA has no objection to Hargray or Bluffton bundling services to introduce new service offerings to meet competition. However, those competitive service offerings should not be subsidized by the USF which is intended only to support basic local service. SCCTA requests permission to intervene in the above-captioned proceeding as a formal party of record. SCCTA estimates that it will take thirty to forty-five minutes for its presentation.

5. SCCTA's intervention will aid the Commission by assisting in the development of a full and fair record to address the issues raised in this proceeding. SCCTA's position in this docket is that it would violate S.C. Code Section 59-9-280 and the Commission Orders implementing the state universal service fund if the universal service fund subsidy is used to support a combination local/toll service offering by Bluffton and Hargray.

6. SCCTA is informed and believes that granting its request to be made a party of record in the above-captioned proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in the issues before it, and should be allowed so that a full and complete record addressing the views and concerns of SCCTA can be developed.

WHEREFORE, SCCTA prays for the following relief:

A. That this petition to intervene be granted by the Commission and that the SCCTA be made a formal party of record to the proceeding.

B. That the SCCTA be allowed to participate fully in this proceeding and to take such positions as it deems advisable.

C. That such other and further relief be granted as is just and proper.

Dated this 15th day of May, 2006.

ROBINSON, MCFADDEN & MOORE, P.C.

s/ Frank R. Elllerbe, III

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Counsel for South Carolina Cable Television Association

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2005-204-C and 2006-99-C

In Re: Docket No. 2005-204-C -- Request for Extended Calling Area from Bluffton/Sun City Hilton Head Area to Hilton Head Island AND Docket No. 2006-99-C -- Petition of BlufftonTelephone Company and Hargray Telephone Company to Implement Extended Area Service (EAS)	)))))))))))))	**CERTIFICATE OF SERVICE**

This is to certify that I, Bonnie D. Shealy, have this day caused to be served upon the person(s) named below the **Petition to Intervene on behalf of the South Carolina Cable Television Association** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

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P.O. Box 11390
Columbia, SC 29211

Margaret M. Fox, Esquire
McNair Law Firm, P.A.
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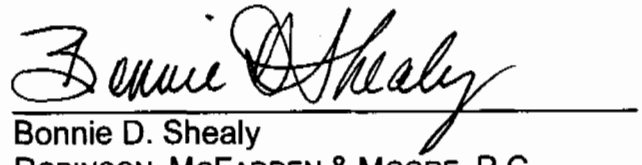
Nanette S. Edwards, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211

Mr. Donald A. Cotnoir
204 Col. Thomas Heyward Road
Sun City Hilton Head
Bluffton, South Carolina 29909

Dated at Columbia, South Carolina this 15th day of May, 2006.

ROBINSON, MCFADDEN & MOORE, P.C.



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