BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

Request for Extended Calling Area From Bluffton/Sun City Hilton Head Area to Hilton Head Island	)	Docket No. 2005-204-C
Petition of Bluffton Telephone Company and Hargray Telephone Company to Implement Extended Area Service (EAS)	)	Docket No. 2006-99-C

RESPONSE AND OBJECTION TO PETITION TO INTERVENE OF SOUTH CAROLINA CABLE TELEVISION ASSOCIATION

Bluffton Telephone Company ("Bluffton") and Hargray Telephone Company ("Hargray") respectfully object to the Petition to Intervene in the above-referenced consolidated dockets filed by South Carolina Cable Television Association ("SCCTA") for the reasons stated herein.

1. In its Petition, SCCTA alleges that its interest in these dockets is to ensure that Bluffton and Hargray do not receive State Universal Service Fund ("USF") support for services other than basic local exchange services.

2. SCCTA's position, as set forth in its Petition, is not an appropriate ground for intervention in these dockets. The issue raised by SCCTA is a generic issue relating to the establishment and operation of the State USF, and is more appropriately addressed in the context of Docket No. 1997-239-C ("the USF Docket") and the orders issued in that docket and subsequent appeals thereof.

3. The Commission's orders in the USF Docket resulted from exhaustive adjudicatory proceedings, in which SCCTA participated and either raised or could have raised the issue that is being presented here. SCCTA has appealed a number of Commission orders in the USF Docket, and various appeals are pending in the South Carolina Supreme Court and Circuit Court.

4. More recently, SCCTA has requested this Commission to investigate the question of whether any carriers of last resort are receiving State USF support based on access lines which are sold as part of a package of bundled services, and to revise the State USF guidelines to address this issue. See Petition of SCCTA in Support of ORS' Petition and to Raise Additional Issues, dated April 5, 2005. While Bluffton and Hargray do not believe the issue presented by SCCTA is ripe for determination by the Commission at this time given the pending State USF appeals covering related issues, that determination should be made by the Commission *in the USF Docket*. Issues that will impact all companies that have an interest in the State USF, like the issue raised by SCCTA, are not appropriately addressed outside the USF Docket, and SCCTA's Petition to Intervene in the instant proceedings on that ground should be denied accordingly.

WHEREFORE, Bluffton Telephone Company and Hargray Telephone Company respectfully request that the Commission deny and dismiss the Petition to Intervene of South Carolina Cable Television Association for the reasons stated herein, and grant such other relief as is just and proper.

Respectfully submitted,

By: _____

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May 22, 2006

Columbia, South Carolina.

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CERTIFICATE OF SERVICE

I, Rebecca W. Martin, Secretary for McNair Law Firm, P. A., do hereby certify that I have this date served one (1) copy of an Objection To Petition To Intervene of South Carolina Cable Television Association regarding the above–referenced matter on the following parties of record by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

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