BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET 2013-55-C

IN RE: South Carolina Telephone Coalition Petition to Modify Alternative Regulation Plans Filed Pursuant to S.C. Code Ann. § 58-9-576(B) to Take Into Account Recent Action by the Federal Communications Commission	)))))))	**PETITION TO INTERVENE OF FRONTIER COMMUNICATIONS OF THE CAROLINAS, INCORPORATED**

Petitioner Frontier Communications of the Carolinas, Incorporated ("Frontier" or "Petitioner"), by and through its undersigned attorneys, hereby petitions before the South Carolina Public Service Commission (the "Commission") pursuant to Rule 103-825 of the Commission's Rules, for an order allowing Frontier to intervene in the above Docket, with full rights to participate as a party of record. In support of its petition, Frontier would show the Commission the following:

1. On February 8, 2013, the South Carolina Telephone Coalition ("SCTC") filed a petition requesting the establishment of new price caps for basic location residential service provided under alternative regulation plans filed by its member companies in order to meet and comply with the rate floors established by the Federal Communications Commission (the "FCC") as explained in its recent Order comprehensively reforming universal service and intercarrier compensation. See, *WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No.*

09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011.

2. On February 11, 2013, SCTC asked for expedited review and the appointment of a hearing officer.

3. On February 13, 2013, the Commission issued a Directive, appointing David Butler as Hearing Officer.

4. The Frontier is a corporation and entity existing under the laws of Delaware and has been certified by the Commission to provide, and is currently providing, local exchange, coin, access and intraLATA toll telecommunications services in South Carolina, which are services subject to the jurisdiction of the Commission. See, *Order No. 09-769*.

5. As a telecommunications carrier doing business in South Carolina, Frontier has an interest in the appropriate implementation of the Orders of the FCC and the Commission, as well as the impact on universal service funding, and seeks to participate in this Docket in order to protect and pursue its interests.

6. Petitioner should therefore be permitted to intervene in this proceeding in order to participate fully and present testimony and other evidence as appropriate.

7. For purposes of this proceeding, Frontier's local authorized and legal representatives in this proceeding are:

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8. Frontier asserts that the granting of its Petition to Intervene will not in any way delay the proceedings in this Docket.

9. Frontier is informed and believes that its request to be made a party of record in this docket is in the interest of the public, is consistent with the policies of the Commission for public participation in the matters before it, and is necessary for the development of a full and complete record.

WHEREFORE, Frontier respectfully prays for the honorable South Carolina Public Service Commission to:

(1) Grant its Petition to Intervene and issue an order in this docket permitting Frontier to participate in this proceeding as a full party of record with all attendant rights thereto;

(2) Allow Frontier to participate fully in the this proceeding and to take such positions as it deems advisable; and

(3) Grant any other and further relief as is just and proper.

Respectfully submitted this the 5th day of March, 2013.

FRONTIER COMMUNICATIONS OF THE CAROLINAS, INCORPORATED

BY: _____

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This is to certify that I, Kathy J. Templeton, an employee of the firm of Richardson Plowden & Robinson, PA, have on March ___, 2013, served one (1) copy of the foregoing document, filed on behalf of Frontier Communications of the Carolinas, Inc. in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service (unless otherwise specified), first class postage prepaid and affixed thereto, and addressed as follows:

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The Honorable Jocelyn G. Boyd, Esquire
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March 5, 2013
Columbia, SC 29201

Kathy J. Templeton

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