BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

**Docket No. 2011-365-C**

| | | |
|---|---|---|
| Re: Application of Liberty-Bell Telecom, LLC d/b/a DISH Network Phone and Internet for a Certificate of Public Convenience and Necessity to Provide Competitive Interexchange And Local Exchange Telecommunications Services in the State of South Carolina | ) | **PETITION TO INTERVENE** |

In response to the Commission's Notice of the Filing of the Application of Liberty-Bell Telecom, LLC d/b/a DISH Network Phone and Internet for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would

potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
Sue-Ann Gerald Shannon
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: Margaret M. Fox

Attorneys for Intervenor South Carolina Telephone Coalition

October 17, 2011

Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

**Docket No. 2011-365-C**

| | |
|---|---|
| Re: Application of Liberty-Bell Telecom, LLC d/b/a DISH Network Phone and Internet for a Certificate of Public Convenience and Necessity to Provide Competitive Interexchange And Local Exchange Telecommunications Services in the State of South Carolina | **CERTIFICATE OF SERVICE** |

I, Rebecca W. Martin, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

Jack J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, South Carolina 29202

C. Lessie Hammonds, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211.

Rebecca W. Martin

Rebecca W. Martin, Legal Assistant
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

October 17, 2011

Columbia, South Carolina