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

Petitioner United Telephone Company of the Carolinas d/b/a CenturyLink ("CenturyLink" or "Petitioner"), by its undersigned attorneys, hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to Rule 103-825 of the Commission's Rules, for an order allowing CenturyLink to intervene in the above-referenced Docket, with full rights to participate as a party of record. In support of its Petition, CenturyLink shows the Commission the following:

1. CenturyLink is a facilities-based incumbent local exchange carrier in South Carolina.

2. CenturyLink seeks to intervene in this proceeding with full rights to participate as a party of record to represent its interests.

3. On February 8, 2013, the South Carolina Telephone Coalition ("SCTC") filed a petition requesting the establishment of new rates for basic local residential service provided by its member companies in order to meet and comply with the rate floors established by the Federal Communications Commission ("FCC") in its Order reforming intercarrier compensation and universal service.[1]

[1] *See Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) and Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011). The

4. On February 12, 2013, the Commission established March 5, 2013 as the deadline for petitions to intervene in this proceeding.

5. On March 5, 2013, the South Carolina Cable Television Association ("SCCTA") filed a Petition to Intervene. In its Petition, SCCTA supports granting SCTC the rate increases it requests. However, SCCTA asserts that following grant of that relief, "the Commission must proceed to make appropriate adjustments to the USF." SCCTA Petition at p. 2. SCCTA then asks the Commission to "require the SCTC companies to complete the appropriate forms for updating and adjusting the amount of subsidy each of them takes from the USF, and [to adjust the USF] based on that new information." SCCTA Petition at p. 3.

6. CenturyLink contributes to and receives funds from the USF. To the extent the Commission decides it would be appropriate to consider the issues raised by SCCTA regarding the USF in the context of this docket, CenturyLink has a direct and substantial interest in this matter.

7. The issue of adjustments to the USF was not raised by SCTC in its Petition; it was raised only by SCCTA on March 5, 2013. Thus, it was not possible for CenturyLink to file a timely petition to intervene to protect its interests regarding USF because those issues were not raised in SCTC's initial filing. While CenturyLink has not fully developed a position at this time, CenturyLink's position is that its participation in this proceeding is essential to protect its interests and will aid the Commission in a full and fair consideration and resolution of the issues raised in this proceeding. CenturyLink asserts that granting its request will not in any way delay the proceedings in this docket.

ILEC Group also notes that the FCC's December 7, 2011 Order in this docket was amended by an Errata Order issued December 9, 2011 ("ICC/USF Reform Order").

8. Counsel for CenturyLink has consulted with counsel for SCTC and counsel for SCTC does not object to this Petition.

9. Correspondence and communications to CenturyLink with respect to this proceeding should be directed to undersigned counsel.

WHEREAS CenturyLink respectfully requests that the Commission grant this Petition and permit its intervention to protect its interests, and grant all other relief that is just and proper.

Respectfully submitted,

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Dated: March 7, 2013

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Docket No. 2013-55-C

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I, Marcia W. Walters, do hereby certify that I have this date served one (1) copy of the attached Petition to Intervene upon the following parties causing said copy to be deposited with the United States Postal Service, first class postage prepaid and properly affixed thereto, and addressed as follows:

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Dated: March 7, 2013