ELLIOTT & ELLIOTT, P.A.
ATTORNEYS AT LAW
1508 Lady Street
COLUMBIA, SOUTH CAROLINA 29201
scelliott@elliottlaw.us

SCOTT ELLIOTT

TELEPHONE (803) 771-0555
FACSIMILE (803) 771-8010

August 24, 2016

VIA E-FILING
Jocelyn Boyd, Esquire
Chief Clerk and Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, SC 29210

Re: In Re: Petition of the South Carolina Telephone Coalition For a Determination To Require Interconnected Voice over the Internet Protocol ("Interconnected VoIP") Service Providers to Contribute to the South Carolina Universal Service Fund, Docket No. 2016-267-C

Dear Ms. Boyd:

Please find attached for filing a Petition to Intervene on behalf of United Telephone Company of the Carolinas d/b/a CenturyLink ("CenturyLink") in the above-referenced matter. By copy of this letter, I am serving all parties of record.

If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/lbk

Enclosures

cc: All parties of record (w/enc.)

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET 2016-267-C

In Re: Petition of the South Carolina Telephone Coalition to Require Interconnected Voice over Internet Protocol ("Interconnected VoIP") Service Providers to Contribute to the South Carolina Universal Service Fund	)))))	PETITION TO INTERVENE

The 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. That the South Carolina Telephone Coalition ("SCTC") has filed a petition requesting a determination that carriers who offer Interconnected VoIP services in South Carolina should contribute to the South Carolina Universal Service Fund.

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

3. That CenturyLink contributes to and receives funds from the USF. As a result, CenturyLink has a direct and substantial interest in this matter. CenturyLink supports the SCTC's request and believes this is an important issue for the Commission to consider given the proliferation of Interconnected VoIP services. CenturyLink's 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.

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

5 That the Commission established the deadline of August 24, 2016 for petitions to intervene in this matter. Thus, CenturyLink's petition is timely filed.

6. That granting CenturyLink's request will not cause any undue delay to this proceeding and will aid the Commission in a full and fair consideration and resolution of the issues raised in this proceeding.

7. That correspondence and communications to CenturyLink with respect to this proceeding should be directed to undersigned counsel.

WHEREFORE, 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,

Scott Elliott
Elliott & Elliott, P.A.
1508 Lady Street
Columbia, SC 29201
803-771-0555 (T)
803-771-8010 (F)
selliott@elliottlaw.us

Jeanne Stockman
CenturyLink
14111 Capital Boulevard
Wake Forest, NC 27587
919-554-7621(T)
919-554-7913(F)
jeanne.w.stockman@centrulink.com

Dated: August 24, 2016

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2016-267-C

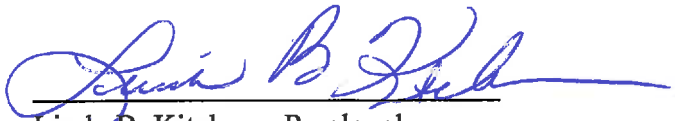
In Re: Petition of the South Carolina Telephone Coalition to Require Interconnected Voice over Internet Protocol ("Interconnected VoIP") Service Providers to Contribute to the South Carolina Universal Service Fund	)))))	CERTIFICATE OF SERVICE

I, Linda B. Kitchens, do hereby certify that I have this date served one (1) copy of the attached Petition to Intervene upon the following parties by U.S. mail:

Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
Bradley S. Wright, Esquire
McNair Law Firm
P.O. Box 11390
Columbia, SC 29211

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, SC 29202-0944



Linda B. Kitchens, Paralegal
Elliott & Elliott, P.A.
1508 Lady Street
Columbia, SC 29201
803-771-0555
linda@elliottlaw.us

Dated: August 24, 2016