## STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger Betsy Wergin Nancy Lange Dan Lipschultz John Tuma Chair Vice Chair Commissioner Commissioner

In the Matter of the Adoption of an Interconnection Agreement by Hiawatha Broadband Communications, Inc. Pursuant to Section 252(i) Docket Number: P-6267, 5561/IC-15-1020

## PETITION OF FEDERATED TELEPHONE COOPERATIVE TO INTERVENE

In support of its petition, pursuant to Minnesota Rules, part 7829.0800, Federated

Telephone Cooperative ("Federated") states as follows:

1. Federated is a Competitive Local Exchange Carrier providing service in western

Minnesota. Federated is located in Chokio, Minnesota.

2. Federated is represented in this matter by its attorney:

Gregory Merz Gray Plant Mooty 500 IDS Center 80 South Eighth Street Minneapolis, MN 55402 Telephone: (612) 632-3257 Facsimile: (612) 632-4257 gregory.merz@gpmlaw.com

3. On December 9, 2015, Federated, through its consultant, Thomas Burns, made a request to Embarq Minnesota, d/b/a CenturyLink ("Embarq") to opt in to the interconnection agreement between Embarq and Hutchinson Telecommunications, Inc. ("HTI"), as provided for by the Communications Act, 47 U.S.C. §252(i).

4. In response to Federated's request, Embarq has taken the position that Federated must provide Embarq with information regarding the specific types of interconnection services and points of interconnection that Federated would need before Embarq would permit Federated to opt in to the Embarq-HTI interconnection agreement.

5. The issues presented by Federated's request to adopt the HTI-Embarq interconnection agreement are the same as the issues raised by Hiawatha Broadband Communication, Inc.'s initial filing in this matter. See December 1, 2015, correspondence from Dan Pecarina, e-filed on December 2, 2015.

6. The outcome in this case will affect Federated with respect to an interest peculiar to Federated, as distinguished from an interest common to the public or ratepayers in general. Accordingly, intervention is authorized by Minn. R. part 7829.0080, subp. 2.

7. Pursuant to Minn. R. part 7829.0800, any objection to the intervention must be filed within ten days of service of the petition to intervene. If no objection is filed and the petition to intervene is not denied or suspended within 15 days of filing, the petition to intervene must be considered granted.

WHEREFORE, for the foregoing reasons, Federated Telephone Cooperative respectfully requests that its petition to intervene be granted.

DATE: December 29, 2015

/s/ Gregory Merz Gregory R. Merz, #185942 GRAY, PLANT, MOOTY, MOOTY & BENNETT, P.A. 500 IDS Center 80 South Eighth Street Minneapolis, MN 55402 Telephone: (612) 632-3257 Facsimile: (612) 632-4257 gregory.merz@gpmlaw.com

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