

FILED

April 19, 2018

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

INDIANA UTILITY
REGULATORY COMMISSION

IN THE MATTER OF THE COMMISSION'S)
TRIENNIAL REVIEW OF THE INDIANA UNIVERSAL) CAUSE NO. 45064
SERVICE FUND)

FRONTIER COMMUNICATIONS' PETITION TO INTERVENE

Frontier Communications, consisting of the Frontier companies of Frontier Communications Of Indiana, LLC, Frontier Communications Of Thorntown, LLC, Frontier Midstates Inc., and Frontier North Inc. ("Frontier"), by counsel, pursuant to 170 I.A.C. 1-1.1-11, hereby files its Petition to Intervene in the above-captioned cause before the Indiana Utility Regulatory Commission ("Commission"). In support of this petition, Frontier states as follows:

1. This proceeding was initiated on March 21, 2018, by the Commission.
2. Frontier is a corporation duly organized and existing under and by virtue of the laws of the State of Indiana with principal corporate offices located at 401 Merritt 7, Norwalk, CT 06851. Frontier is a communications company engaged in the provision of telecommunications services within its certificated territory in the State of Indiana. Additionally, Frontier is an Eligible Telecommunications Company that receives funding from the federal and state of Indiana Universal Service Funds which is the subject matter of this proceeding. Decisions made in this proceeding likely will impact Frontier. Accordingly, Frontier's intervention is necessary and in the public interest.
3. No other party can adequately represent Frontier's interests in this proceeding.
4. Frontier has participated in prior proceedings before this Commission.

5. The addition of Frontier as a party to this Cause will not unduly burden the proceeding, and Frontier understands that it is bound by the record as it stands at the time its Petition to Intervene is granted.

6. This Petition to Intervene is being filed more than five (5) days prior to any date set for the initial evidentiary hearing on the merits in this proceeding.

7. The attorney representing Frontier in this proceeding is:

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The above-named attorney is authorized to accept on behalf of Frontier service of pleadings, orders or other documents filed or served on the parties.

WHEREFORE, Frontier respectfully requests that the Commission grant its *Petition to Intervene* and that Frontier be made a party to this proceeding with respect to all matters and for all other proper and further relief as the Commission may deem appropriate.

Respectfully submitted,

/s/ Anne E. Becker
Anne E. Becker, (#14185-03)

Attorney for Frontier Communications

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon the following via electronic mail, this 19th day of April, 2018:

OUC

William Fine

Karol Krohn

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/s/ Anne E. Becker

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