STATE OF GEORGIA
BEFORE THE PUBLIC SERVICE COMMISSION

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| **In Re:** | ) | |
| | ) | |
| **Generic Proceeding to Implement House Bill 168;** | ) | **Docket No. 32235** |
| | ) | |

**APPLICATION FOR LEAVE TO INTERVENE BY GEORGIA TELEPHONE ASSOCIATION D/B/A GTBA-GEORGIA'S RURAL TELEPHONE AND BROADBAND ASSOCIATION**

Georgia Telephone Association d/b/a GTBA-Georgia's Rural Telephone and Broadband Association ("GTBA"), by and through the undersigned counsel and pursuant to O.C.G.A. §§ 46-2-59 and 50-13-14, Section 515-2-1-.06 of the Rules of the Georgia Public Service Commission ("Commission"), and the August 1, 2023 "Procedural and Scheduling Order on Universal Access Fund Contribution Methodology," files this Application for Leave to Intervene in the above-referenced docket. In support of this application, GTBA shows the following:

1.

GTBA is an association comprised of twenty-four Tier II incumbent local exchange carriers ("ILECs") pursuant to O.C.G.A §§ 46-5-162(10)(B) and 46-5-163(c). Of GTBA's twenty-four Tier II ILEC members, twenty applied for reimbursement from the Universal Access Fund ("UAF") under O.C.G.A. § 46-5-167(d)(2)(B) for the 27th UAF year.

2.

GTBA and its members have been parties or participants in prior UAF matters.

3.

On behalf of its members, GTBA has an interest in this proceeding because its members' rights and interests could be substantially affected by any Commission decision

in Docket No. 32235. GTBA's membership is comprised of Tier II ILECS that contribute to the UAF, and twenty of its members receive disbursements from the UAF. As a result, this Docket may adversely affect GTBA's members' interests in providing telecommunications service to rural Georgia customers. GTBA and its members' interest cannot be adequately represented by any other party in this matter due to GTBA's diverse makeup and the unique viewpoints and business structures of its members.

4.

At this time, according to Docket No. 32235, no other party has intervened pursuant to the August 1, 2023 "Procedural and Scheduling Order on Universal Access Fund Contribution Methodology."

5.

GTBA intends to submit comments and reply comments to the three "Issues Involved" found in Section VI of the August 1, 2023 "Procedural and Scheduling Order on Universal Access Fund Contribution Methodology" in a brief to be filed separately from this Application for Leave to Intervene. At present, GTBA does not intend to submit testimony. According to Section II of the Order, Commission Staff concluded that an evidentiary hearing is not necessary and instead recommended that the Commission establish a briefing schedule for interested parties to present their arguments. If at any time the proceedings are open for testimony or other evidence, GTBA may present testimony as needed.

6.

To protect its interests and to address the issues being raised in this proceeding, GTBA requests intervention as a full party of record, including without limitation, the right

to file comments, cross-examine any witnesses offered by other parties, and review any confidential or trade secret data sets submitted in this proceeding subject to the necessary protective orders or non-disclosure agreements.

7.

GTBA requests that all notices, correspondence, pleadings, and other documents filed herein be addressed to the following:

Patrick T. O'Connor
J. Ryan Beasley
Amelia C. Stevens
Oliver Maner LLP
218 W State Street
Savannah, Georgia 31401
912-236-3311
pto@olivermaner.com
rbeasley@olivermaner.com
astevens@olivermaner.com

With copy to:
Rhonda Chatham
P O Box 1613
Ellijay, GA 30540
rchatham@gta.org

GTBA respectfully requests the Commission grant its Application for Leave to Intervene and to participate fully as a party of record in this docket.

Respectfully submitted, this 22nd day of August, 2023.

OLIVER MANER LLP

/s/ **AMELIA C. STEVENS**
PATRICK T. O'CONNOR
Georgia Bar No. 548425
J. RYAN BEASLEY
Georgia Bar No. 981236
AMELIA C. STEVENS
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## CERTIFICATE OF SERVICE

I certify that the foregoing **Application for Leave to Intervene** in Docket No. 32235 was filed with the Public Service Commission by electronic and hand delivery on this date. An electronic copy of the same was served upon all parties listed below by electronic mail as follows:

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street S.W.
Atlanta, GA 30334-5701
*Via email* stanner@psc.ga.gov *and hand delivery*

Patrick Turner
AVP-Senior Legal Counsel
AT&T Georgia, South Carolina, and Tennessee
One CNN Center, SW1424B
Atlanta, Georgia 30303
*Via email* pt1285@att.com

Patrick Reinhardt
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334
*Via email* patrickr@psc.state.ga.us

Rhonda Chatham
Executive Director, Georgia Telephone Association d/b/a GTBA-Georgia's Rural Telephone and Broadband Association
P.O. Box 1613
Ellijay, GA 30540
*Via email* rchatham@gta.org

This 22nd day of August, 2023.

OLIVER MANER LLP

/s/ **AMELIA C. STEVENS**
PATRICK T. O'CONNOR
Georgia Bar No. 548425
J. RYAN BEASLEY
Georgia Bar No. 981236
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Georgia Bar No. 758771

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**VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE**

Rhonda Chatham personally appeared before the undersigned Notary Public and stated under oath that she is Executive Director of the GTBA-Georgia's Rural Telephone and Broadband Association ("GTBA"), that she is authorized by GTBA to execute this Verification on its behalf, and that on her information and belief that the facts alleged in GTBA's *Application for Leave to Intervene* are true and correct to the best of her knowledge.

Rhonda Chatham

Sworn to and subscribed
Before me this 17th day
of August, 2023

Cora Payne
Notary Public

CORA PAYNE NOTARY PUBLIC GILMER COUNTY, GA

My Commission Expires: Feb 28, 2027