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May 5, 2009

Secretary James J. McNulty
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Petition to Intervene in Docket No. C-2009-2098380

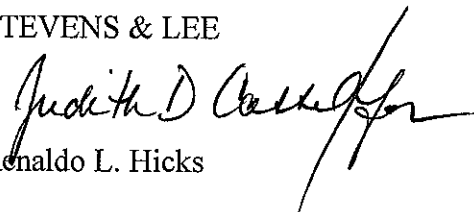
Dear Secretary McNulty:

Enclosed for filing on behalf of Sprint Communications Company, L.P., Sprint Spectrum, L.P., Nextel Communications of the Mid-Atlantic, Inc., and NPCR, Inc., is an original Petition for Intervention, in the above-referenced matter. This Petition has been e-filed at the Pennsylvania Public Utility Commission's website. Copies have been served in accordance with the attached Certificate of Service.

If you have any questions, please feel free to contact me.

Very truly yours,

STEVENS & LEE


Renaldo L. Hicks

JDC

cc: Certificate of Service

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A PROFESSIONAL CORPORATION

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

AT&T Communications of Pennsylvania, LLC	:	
Complainant	:	
v.	:	Docket No. C-2009-2098380, et al.
Armstrong Telephone Company - Pennsylvania, et al. ¹	:	
Respondents	:	
TCG New Jersey, Inc.	:	
Complainant	:	
v.	:	Docket No. C-2009-2099805, et al.
Armstrong Telephone Company - Pennsylvania, et al.	:	
Respondents	:	
TCG Pittsburgh, Inc.	:	
Complainant	:	
v.	:	Docket No. C-2009-2098735, et al.
Armstrong Telephone Company - Pennsylvania, et al.	:	
Respondents	:	

PETITION FOR INTERVENTION

¹ Respondents in each of the Complaints filed by AT&T, TCG New Jersey and TCG Pittsburgh include thirty two Pennsylvania rural incumbent local exchange carriers.

Pursuant to 52 Pa. Code Section 5.71, et seq., Sprint Communications Company, L.P., Sprint Spectrum, L.P., Nextel Communications of the Mid-Atlantic, Inc., and NPCR, Inc. (collectively "Sprint"), by and through the undersigned counsel, hereby petitions to intervene as a Party in the above-captioned proceeding. In support of this Petition, Sprint states as follows:

1. Sprint is authorized by the Commission to provide interchange carrier ("IXC") telecommunications services in Pennsylvania. Specifically, Sprint pays access charges to the Respondent Pennsylvania Rural Incumbent Local Exchange Carriers ("RLECs") whenever a Sprint customer originates or terminates a call through an RLEC's local customer. Sprint is also a competitor of the Respondent RLECs where such RLECs provide IXC services to their local customers. Consequently, Sprint is directly and significantly impacted by the instant Complaints and the Commission's resolution of these matters.

2. Sprint desires to participate in this proceeding to ensure that its interests, and the interests of its customers, are fully protected.

3. No other party to this proceeding represents the interests of Sprint and its customers.

4. Sprint submits that there are several issues which must be examined in the context of this proceeding, including but not limited to:

- a) Whether the disparity between the individual RLEC intrastate and interstate switched access rates is so high as to constitute unjust, unreasonable and discriminatory rates in violation of 66 Pa.C.S. § 1309 *et. seq.*?
- b) Whether the switched access rates charged by each RLEC to Competitive Local Exchange Carriers ("CLECs"), Wireless

Carriers and IXC's, are discriminatory, in violation of 66 Pa.C.S. § 1304 *et. seq.*?

c) Whether the switched access rates charged by Pennsylvania RLECs are anticompetitive, in violation of 66 Pa.C.S. § 3011 *et. seq.*?

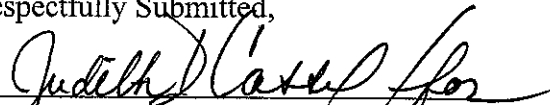
5. The Petitioner's attorneys in this matter are:

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6. All correspondence, notices, documents, orders or other communications with respect to the above-captioned proceedings should be addressed to Renardo L. Hicks, Esquire, at the above address.

WHEREFORE, Petitioner respectfully requests that this Commission grant Petitioner's request to intervene as a party in the above captioned matter.

Respectfully Submitted,



FOR Sprint Communications Company, L.P.,
Sprint Spectrum, L.P., Nextel Communications
of the Mid-Atlantic, Inc., and NPCR, Inc.
Renardo L. Hicks, Esquire
PA ID No. 40404
Michael Gruin, Esquire
PA ID No. 78625
Stevens & Lee
17 North Second Street, 16th Floor
Harrisburg, PA 17101

Dated: May 5, 2009

CERTIFICATION OF SERVICE

I hereby certify that I have served a copy of the foregoing Petition For Intervention upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 and 1.55, via electronic mail.

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