

Sprint



Together with NEXTEL

Sprint Nextel

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Jennifer A. Duane

Attorney, State Regulatory/Northeast

Jennifer.a.duane@sprint.com

January 9, 2007

ORIGINAL

VIA OVERNIGHT MAIL

James J. McNulty
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, Pennsylvania 17105-3265

**DOCUMENT
FOLDER**

RECEIVED

JAN 9 2007

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

Re: Joint Application of Commonwealth Telephone Company, CTSI, LLC, and CTE Telecom, LLC d/b/a Commonwealth Long Distance Company For All Approvals Under the Public Utility Code For the Acquisition by Citizens Communications Company of All of the Stock of the Joint Applicants' Corporate Parent, Commonwealth Telephone Enterprises, Inc.
Docket Nos. A-310800F0010, A-311095F0005, A-311225F0003

Dear Secretary McNulty:

I enclose for filing an original and three (3) copies of Sprint Communications Company L.P.'s ("Sprint") Motion for Leave to Withdraw its Petition to Intervene and Notice of Withdrawal of its Protest from the above-referenced docket. All parties have been served in accordance with the attached Certificate of Service.

Please return a filed-stamped copy of this letter in the enclosed self-addressed, postage-prepaid envelope. If you have any questions, please feel free to contact me. Thank you for your attention to this matter.

Sincerely,

Jennifer A. Duane

Enclosure

cc: Susan D. Colwell, Administrative Law Judge (via electronic and regular mail)
Parties on the attached Certificate of Service (via electronic and regular mail)

43

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re Joint Application of	:	
	:	
Commonwealth Telephone Company	:	
CTSI, LLC, and	:	A-310800F0010
CTE Telecom, LLC d/b/a Commonwealth	:	A-311095F0005
Long Distance Company	:	A-311225F0003
	:	
For All Approvals Under the Public	:	
Utility Code for the Acquisition by	:	
Citizens Communications Company of	:	
All of the Stock of the Joint Applicant's	:	
Corporate Parent, Commonwealth	:	
Telephone Enterprises, Inc.	:	

RECEIVED

JAN 9 2007

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

**SPRINT COMMUNICATIONS COMPANY L.P.'S MOTION FOR LEAVE TO
WITHDRAW ITS PETITION TO INTERVENE AND NOTICE OF WITHDRAWAL
OF PROTEST**

Pursuant to 52 Pa. Code § 5.94, Sprint Communications Company L.P. ("Sprint") hereby files this Motion for Leave to Withdraw its Petition to Intervene and thereby terminate its participation in the above-captioned proceeding. Additionally, Sprint hereby provides with this filing its Notice of Withdrawal of its Protest to the proposed acquisition of the Commonwealth Telephone Companies¹ (collectively the "Joint Applicants") by Citizens Communications Company ("Citizens"). In support of this Motion and Notice, Sprint states as follows:

1. On September 29, 2006 the Joint Applicants filed an Application with the Pennsylvania Public Utility Commission ("Commission") seeking approval for its proposed merger with Citizens under which Citizens will acquire the stock of Commonwealth

¹ The Commonwealth Telephone Companies include the Commonwealth Telephone Company ("CTCo"), CTSI, LLC ("CTSI") and CTE Telecom, LLC d/b/a Commonwealth Long Distance Company ("CLD") and their corporate parent, Commonwealth Telephone Enterprises, Inc.

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Telephone Enterprises (“CTE”) and, indirectly, the stock of the Joint Applicants. CTE will then become a wholly-owned, direct subsidiary of Citizens.²

2. Notice of the filing appeared in the Pennsylvania Bulletin on October 14, 2006. 36 Pa. B. 6355. The notice directed the filing of formal protests with the Commission by October 30, 2006.

3. Sprint timely filed its Protest to the Joint Application as well as a Petition to Intervene in the proceeding. On November 10, 2006 the Joint Applicants filed Joint Answers and Preliminary Objections seeking to dismiss Sprint’s Protest and Petition to Intervene on the grounds that Sprint lacked standing to participate in the matter. Sprint submitted its Answer to the Joint Applicants’ Preliminary Objections on November 20, 2006.

4. On December 14, 2006 presiding Administrative Law Judge (“ALJ”) Susan D. Colwell issued an Initial Decision finding that Sprint had the requisite standing to permit it to participate in this matter. ALJ Colwell granted Sprint’s Petition to Intervene and dismissed the Joint Applicants’ Preliminary Objections.³

5. Sprint initially sought to participate in this proceeding to ensure that its interests as a CLEC seeking to compete in the service territories of the combined companies were fully protected in this matter.⁴ It filed its Protest to urge the Commission to impose appropriate conditions on its approval of the proposed acquisition to facilitate competitive entry into their respective service territories. Since the time of Sprint’s filing of these pleadings, the issues forming the basis of Sprint’s Protest have been addressed to Sprint’s

² Joint Application at ¶ 17.

³ Initial Decision at 7, 12.

⁴ See, e.g., *Application of Sprint Communications Company L.P. to Amend Its Certificate of Public Convenience to Begin to Offer, Render, Furnish, and Supply Competitive Local Exchange Telephone Services to the Public in the Commonwealth of Pennsylvania*, Docket Nos. A-310183F0002AMA, A-310183F0002AMB, A-310183F0002AMC (Order entered December 1, 2006).

satisfaction. Accordingly, Sprint hereby gives this Notice of the withdrawal of its Protest from this matter.

WHEREFORE, for the above-stated reasons, Sprint respectfully requests leave to withdraw its petition to intervene and thereby terminate its participation in this merger application proceeding.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY L.P.



Jennifer A. Duane
2001 Edmund Halley Drive, Second Floor
Mailstop: VARESP0201-A208
Reston, Virginia 20191
(703) 592-7791 (Voice)
(703) 592-7404 (Facsimile)
Jennifer.a.duane@sprint.com

Dated: January 9, 2007

**Joint Application of Commonwealth Telephone Company, CTSI, LLC and CTE Telecom,
LLC d/b/a Commonwealth Long Distance Company For All Approvals Under the Public
Utility Code For the Acquisition by Citizens Communications Company of
All of the Stock of the Joint Applicants' Corporate Parent, Commonwealth Telephone
Enterprises, Inc.**

Docket Nos. A-310800F0010, A-311095F0005, A-311225F0003

Service List

I hereby certify that I have on this 9th day of January 2007 served a true and correct copy of the foregoing document by Electronic and First Class U.S. Mail in accordance with the requirements of 52 Pa. Code § 1.54.

Shaun A. Sparks
Joel H. Cheskis
Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
Harrisburg PA 17101-1921

Lauren M. Lepkoski
Sharon E. Webb
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg PA 17101

Johnnie E. Simms,
Robert V. Eckenrod
Pa. Public Utility Commission
Office of Trial Staff
P.O. Box 3265
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Hilary Glassman
Citizens Communications Company
3 High Ridge Park
Stamford, Connecticut 06905

Scott Rubin
3 Lost Creek Drive
Selingsrove, Pennsylvania 17810

Raymond Ostroski
Commonwealth Telephone Enterprises
100 CTE Drive
Dallas, Pennsylvania 18612

Norman James Kennard
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Harrisburg Energy Center
100 North Tenth Street, P.O. Box 1778
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John F. Povilaitis
Matthew A. Totino
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McNees Wallace & Nurick
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17102-2025

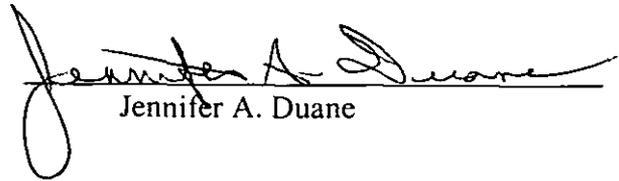
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JAN 9 2007

**PUBLIC UTILITY COMMISSION
REGULATORY BUREAU**

Honorable Susan D. Colwell
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

Michael W. Fleming
Williams Mullen
8270 Greensboro Drive
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McLean, Virginia 22102


Jennifer A. Duane

Hawke
 Mckeon
 Sniscak &
 Kennard LLP
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Norman James Kennard
Lillian Smith Harris
Scott T. Wyland
Todd S. Stewart
Craig R. Burgraff

Steven D. Snyder
Janet L. Miller
Steven K. Haas
William E. Lehman
Rikardo J. Hull
Katherine E. Lovette
Amy A. Whitney

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmsk-law.com

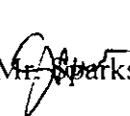
January 9, 2007

Via Hand Delivery

Shaun A. Sparks
Joel Cheskis
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1921

**DOCUMENT
FOLDER**

Re: Joint Application of Commonwealth Telephone Company CTSI, LLC and CTE Telecom, LLC d/b/a Commonwealth Long Distance Company For All Approvals Under The Public Utility Code for the Acquisition By Citizens Communications Company of All of the Stock of the Joint Applicants' Corporate Parent, Commonwealth Telephone Enterprises, Inc., Docket Nos. A-310800F0010, A-311095F0005 and A-311225F0003;
RESPONSES TO OFFICE OF CONSUMER ADVOCATE INTERROGATORIES, SET V

Dear Mr.  Sparks and Mr.  Cheskis:

Enclosed please find Responses to Office of Consumer Advocate Interrogatories, Set V on behalf of the Joint Applicants. Portions of these answers contain proprietary and/or highly confidential information and we ask that they are treated appropriately under the terms of the Protective Order.

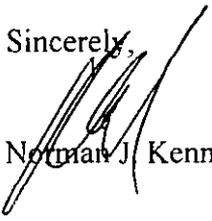
2007 JAN 10 PH 4: 19
PA PUC
SECRETARY'S BUREAU

RECEIVED

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

If you have any questions, please do not hesitate to contact me.

Sincerely,


Norman J. Kennard

NJK/ajt
Enclosure

cc: James J. McNulty, Secretary (without enclosures)
Honorable Susan D. Colwell (without enclosures)
Robert V. Eckenrod (with enclosures)
Lauren M. Lepkoski (with enclosures)
Scott J. Rubin (with enclosures)
Lillian S. Harris (with enclosures)
Allen Buckalew (with enclosures)
Debbie Goldman (with enclosures)
Robert Loube (with enclosures)



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

January 10, 2007

In Re: A-310800F0010
A-311095F0005
A-311225F0003

JOHNNIE E SIMMS ESQUIRE
ROBERT ECKENROD ESQUIRE
OFFICE OF TRIAL STAFF
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PO BOX 3265
HARRISBURG PA 17105

**DOCUMENT
FOLDER**

Joint Application of Commonwealth Telephone Company, CTSI, LLC
And CTE Telecom, LLC d/b/a Commonwealth Long Distance Company,
For All Approvals Under The Public Utility Code For The
Acquisition By Citizens Communications Company Of All Of The
Stock Of The Joint Applicants' Corporation Parent, Commonwealth
Telephone Enterprises, Inc.

Public Input Hearing Notice

This is to inform you that Telephonic Public Input
Hearing(s) on the above-captioned case will be held as follows:

Type: Telephonic Public Input Hearing

Date: Tuesday, January 30, 2007

Time: 10:00 a.m.

Location: Hearing Room 4
Plaza Level
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Presiding: Administrative Law Judge Susan D. Colwell
PO Box 3265
Harrisburg, PA 17105-3265
Phone: 717.783.5452
Fax: 717.787.0481

DOCKETED
JAN 22 2007

If witnesses are located in Harrisburg, dial the following number between 9:55 a.m. and 10:00 a.m.: 433-9020. If witnesses are located outside Harrisburg, call 1-866-224-4890 and then enter the PIN (5613) followed by the (#) sign. After dialing the number, enter the PIN (2567) and then enter the (#) sign.

You will hear three tones indicating that you have been connected to the conference call. If you are disconnected, please follow the same procedure to be reconnected.

If you have any questions, please do not hesitate to call this office.

If you have any hearing exhibits to which you will refer during the hearing, 3 copies must be sent to the Administrative Law Judge and 1 copy each must be sent to every other party. A copy of the Parties list is attached. All copies must be received at least 3 days before the hearing.

Parties interested in attending are required to appear in the scheduled hearing room. Telephonic attendance is for those giving testimony. Speakers who wish to appear in person may do so after registering with the Office of Consumer Advocate or the presiding officer on or before January 23, 2007.

The Office of Consumer Advocate is responsible for scheduling witnesses and any individual interested in testifying must contact Shawn Sparks on or before January 23, 2007.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission:

- Scheduling Office: (717) 787-1399.
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

A-310800F0010, A-311095F0005, A-311225F0003 JOINT APPLICATION OF COMMONWEALTH TELEPHONE COMPANY, CTSI, LLC AND CTE TELECOM, LLC D/B/A COMMONWEALTH LONG DISTANCE COMPANY FOR ALL APPROVALS UNDER THE PUBLIC UTILITY CODE FOR THE ACQUISITION BY CITIZENS COMMUNICATIONS COMPANY OF ALL OF THE STOCK OF THE JOINT APPLICANTS' CORPORATE PARENT, COMMONWEALTH TELEPHONE ENTERPRISES, INC.

✓ NORMAN J KENNARD ESQUIRE
LILLIAN S HARRIS ESQUIRE
HAWKE MCKEON SNISCAK & KENNARD LLP
100 NORTH TENTH STREET
HARRISBURG PA 17101
717-236-1300

✓ RAYMOND OSTROSKI ESQUIRE
COMMONWEALTH TELEPHONE ENTERPRISES INC
100 CTE DRIVE
DALLAS PA 18612
570-631-2802

✓ IRWIN A POPOWSKY ESQUIRE
JOEL CHESKIS ESQUIRE
SHAUN A SPARKS ESQUIRE
OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET
5TH FLOOR FORUM PLACE
HARRISBURG PA 17101-1923
717-783-5048

✓ JOHNNIE E SIMMS ESQUIRE
ROBERT ECKENROD ESQUIRE
OFFICE OF TRIAL STAFF
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✓ HILARY GLASSMAN ESQUIRE
CITIZENS COMMUNICATIONS COMPANY
3 HIGH RIDGE PARK
STAMFORD CT 06905
203-614-5047

✓ PAMELA C POLACEK ESQUIRE
ADAM L BENSHOFF ESQUIRE
MCNEES WALLACE & NURICK
100 PINE STREET PO BOX 1166
HARRISBURG PA 17108-1166

✓ JOHN F POVILAITIS
MATTHEW A TOTINO
RYAN RUSSELL OGDEN & SELTZER LLP
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HARRISBURG PA 17102-2025

✓ JENNIFER A DUANE
SPRINT COMMUNICATIONS COMPANY LP
2001 EDMUND HALLEY DRIVE
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✓ WILLIAM R LLOYD JR ESQUIRE
SHARON E WEBB ESQUIRE
LAUREN M LEPKOSKI ESQUIRE
OFFICE OF SMALL BUSINESS ADVOCATE
SUITE 1102 COMMERCE BUILDING
300 NORTH SECOND STREET
HARRISBURG PA 17101

✓ SCOTT RUBIN ESQUIRE
3 LOST CREEK DRIVE
SELINGSGROVE PA 17870

DATE: January 10, 2007

SUBJECT: Public Input Telephone Hearing

TO: Shawn Sparks
Office of Consumer Advocate

FROM: Administrative Law Judge Susan D. Colwell

RE: A-310800F0010, A-311095F0005, A-311225F0003 - Joint Application of Commonwealth Telephone Company, CTSI, LLC And CTE Telecom, LLC d/b/a Commonwealth Long Distance Company, For All Approvals Under The Public Utility Code For The Acquisition By Citizens Communications Company Of All Of The Stock Of The Joint Applicants' Corporation Parent, Commonwealth Telephone Enterprises, Inc.

DOCUMENT
FOLDER

DOCKETED
APR 10 2007

The telephonic public input hearing will be conducted through the Commonwealth Conference Operator.

If witnesses are located in Harrisburg, dial the following number between 9:55 a.m. and 10:00 a.m.: 433-9020. If witnesses are located outside Harrisburg, call 1-866-224-4890 and then enter the PIN (5613) followed by the (#) sign. After dialing the number, enter the PIN (2567) and then enter the (#) sign.

You will hear three tones indicating that you have been connected to the conference call. If you are disconnected, please follow the same procedure to be reconnected.

If the witnesses have any hearing exhibits to which they will refer to during the hearing, 3 copies must be sent to the Administrative Law Judge and 1 copy each must be sent to every other party. A copy of the Parties list is attached to the Notice. All copies must be received at least 3 days before the hearing.

RECEIVED

JAN 19 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

January 10, 2007

In Re: A-310800F0010
 A-311095F0005
 A-311225F0003

(SEE LETTER DATED 11/8/06)

Joint Application of Commonwealth Telephone Company, CTSI, LLC
And CTE Telecom, LLC d/b/a Commonwealth Long Distance Company,
For All Approvals Under The Public Utility Code For The
Acquisition By Citizens Communications Company Of All Of The
Stock Of The Joint Applicants' Corporation Parent, Commonwealth
Telephone Enterprises, Inc.

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Hearing(s) on the above-captioned case will be held as follows:

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Time: 10:00 a.m.

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 Plaza Level
 Commonwealth Keystone Building
 400 North Street
 Harrisburg, PA 17120

Presiding: Administrative Law Judge Susan D. Colwell
 PO Box 3265
 Harrisburg, PA 17105-3265
 Phone: 717.783.5452
 Fax: 717.787.0481

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Parties interested in attending are required to appear in the scheduled hearing room. Telephonic attendance is for those giving testimony. Speakers who wish to appear in person may do so after registering with the Office of Consumer Advocate or the presiding officer on or before January 23, 2007.

The Office of Consumer Advocate is responsible for scheduling witnesses and any individual interested in testifying must contact Shawn Sparks on or before January 23, 2007.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission:

- Scheduling Office: (717) 787-1399.
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

pc: Judge Colwell
June Perry - LA, 3rd Floor, Room N302 (hand delivery)
Cyndi Page - CMU, Keystone 3NE
Dawn Reitenbach
Beth Plantz
Docket Section
Calendar File



ORIGINAL

McNees Wallace & Nurick LLC
attorneys at law

PAMELA C. POLACEK
DIRECT DIAL: (717) 237-5368
E-MAIL ADDRESS: PPOLACEK@MWN.COM

January 12, 2007

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

DOCUMENT
FOLDER

VIA HAND DELIVERY

**RE: Joint Application of Commonwealth Telephone Company CTSI, LLC and CTE Telecom, LLC d/b/a Commonwealth Long Distance Company For All Approvals Under the Public Utility Code for the Acquisition By Citizens Communications Company of All Stock of the Joint Applicants' Corporate Parent, Commonwealth Telephone Enterprises, Inc.
Docket Nos.: A-310800F0010, A-311095F0005 and A-311225F0003**

Dear Secretary McNulty:

Enclosed please find an original and 3 copies of the Blue Ridge Digital Phone Company Petition for Leave to Withdraw Intervention and Notice of Withdrawal of Protest for filing with the Commission in the above-referenced proceeding.

Copies of the Petition and transmittal letter are being serviced on the parties consistent with the attached Certificate of Service. Please date stamp the extra copies of this transmittal letter and the protest, and kindly return it to our messenger for our filing purposes. Thank you.

RECEIVED
2007 JAN 12 AM 2:23
PA PUC
SECRETARY'S BUREAU

Very truly yours,

McNEES WALLACE & NURICK LLC

By *Pamela C. Polacek*
Pamela C. Polacek

Counsel to Blue Ridge Digital
Phone Company

PCP/nk

Enclosures

c: Administrative Law Judge Susan D. Colwell (via hand delivery)
Certificate of Service

101

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Application of Commonwealth :
Telephone Company CTSI, LLC and :
CTE Telecom, LLC d/b/a Commonwealth :
Long Distance Company For All Approvals :
Under the Public Utility Code for the :
Acquisition By Citizens Communications :
Company of All Stock of the Joint :
Applicants' Corporate Parent, :
Commonwealth Telephone Enterprises, Inc. :

Docket Nos.: A-310800F0018
A-311095F0005
A-311225F0003

RECEIVED
2007 JAN 12 AM 2:24
PA PUC
SECRETARY'S BUREAU

**BLUE RIDGE DIGITAL PHONE COMPANY PETITION
FOR LEAVE TO WITHDRAW INTERVENTION AND
NOTICE OF WITHDRAWAL OF PROTEST**

Pursuant to Section 5.94 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") regulations, 52 Pa. Code § 5.94, Blue Ridge Digital Phone Company ("Blue Ridge Phone") hereby files this Petition for Leave to Withdraw Intervention and Notice of Withdrawal of Protest in the above-referenced proceeding. In support of this Petition and Notice, Blue Ridge states as follow:

1. On September 29, 2006, Commonwealth Telephone Company ("Commonwealth Telephone"), CTSI, LLC and CTE Telecom, LLC d/b/a Commonwealth Long Distance Company (collectively, "Joint Applicants") filed a Joint Application for approval under the Public Utility Code of the acquisition by Citizens Communications Company of the Joint Applicants' corporate parent, Commonwealth Telephone Enterprises, Inc.

2. Notice of the filing was published in the *Pennsylvania Bulletin* on October 14, 2006, with a protest and intervention deadline of October 30, 2006. 36 Pa. B. 6355 (October 14, 2006).

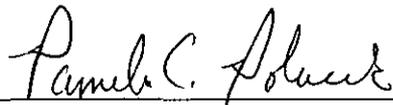
3. Blue Ridge Phone filed a Petition to Intervene and Protest on October 30, 2006, discussing, among other items, Commonwealth Telephone's opposition to the Competitive Local Exchange Carrier ("CLEC") application filed by Blue Ridge Phone to enter Commonwealth Telephone's service territory at Docket No. A-311397F0002 AMB.

4. Commonwealth Telephone's objections to Blue Ridge Phone's CLEC application have been resolved. As a result, Blue Ridge Phone hereby gives notice of the withdrawal of its Protest and request for leave to withdraw its Petition to Intervene in this matter.

WHEREFORE, for the reasons stated herein, Blue Ridge Phone respectfully request to withdraw its protest and intervention in this matter.

Respectfully submitted

McNEES WALLACE & NURICK LLC

By 
Pamela C. Polacek (I.D. # 78276)
Adam L. Benshoff (I.D. #200498)
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
717.232.8000 (phone)
717.237.5300 (fax)

Counsel to Blue Ridge Digital Phone
Company

Dated: January 12, 2007

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

Lillian S. Harris, Esq.
Hawke McKeon Sniscak & Kennard LLP
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105

Norman J. Kennard, Esq.
Hawke McKeon Sniscak & Kennard LLP
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105

Joel Cheskis, Esq.
Shaun Sparks, Esq.
Office of Consumer Advocate
555 Walnut Street
Forum Place, Fifth Floor
Harrisburg, PA 17101

Lauren M. Lepkoski, Esq.
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Johnnie Simms, Esq.
Robert Eckenrod, Esq.
Office of Trial Staff
Pennsylvania Public Utility Commission
The Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

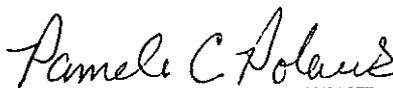
Jennifer A. Duane, Esq.
Sprint Nextel
2001 Edmund Halley Drive, 2nd Floor
Reston, VA 20191

Raymond Ostroski, Esq.
Sr. V. P., General Counsel and Secretary
Commonwealth Telephone Enterprises
100 CTE Drive
Dallas, PA 18612

Hilary Glassman, Esq.
Sr. V.P. and General Counsel
Citizens Communications Company
3 High Ridge Park
Stamford, CT 06905

Scott J. Rubin, Esq.
3 Lost Creek Drive
Selinsgrove, PA 17870

John F. Povilaitis, Esq.
Ryan, Russell, Odgen & Seltzer, L.P.
Suite 101
800 North Third Street
Harrisburg, PA 17102-2025


Pamela C. Polacek

Counsel to Blue Ridge Digital
Phone Company

Dated this 12th day January, 2007, in Harrisburg, Pennsylvania.

RECEIVED
2007 JAN 12 AM 2:23
PA PUC
SECRETARY'S BUREAU



McNees Wallace & Nurick LLC
attorneys at law

ORIGINAL

PAMELA C. POLACEK
DIRECT DIAL: (717) 237-5368
E-MAIL ADDRESS: PPOLACEK@MWN.COM

DOCUMENT
FOLDER

January 12, 2007

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

VIA HAND DELIVERY

RE: Joint Application of Commonwealth Telephone Company, CTSL, LLC and CTE Telecom, LLC d/b/a Commonwealth Long Distance Company For All Approvals Under the Public Utility Code for the Acquisition By Citizens Communication Company of All Stock of the Joint Applicants' Corporate Parent, Commonwealth Telephone Enterprises, Inc.; Docket Nos.: A-310800F0010, A-311095F0005 and A-311225F0003

Dear Secretary McNulty:

On January 3, 2007, the Broadband Cable Association of Pennsylvania ("BCAP") filed with the Pennsylvania Public Utility Commission Exceptions to the Initial Decision of Administrative Law Judge Colwell denying BCAP's intervention in the above-referenced dockets. The Initial Decision was re-served to the parties on January 4, 2007, with a deadline of January 12th for Exceptions. BCAP will not be submitting supplemental or revised Exceptions and continues to fully support the arguments in its January 3rd Exceptions.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this letter, and kindly return it for our filing purposes. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

Pamela C. Polacek

Pamela C. Polacek

Counsel to the Broadband Cable
Association of Pennsylvania

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2007 JAN 12 AM 4:03
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Enclosures
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SECRETARY'S BUREAU

DOCKETED
JAN 17 2007

- c: Certificate of Service
Honorable Susan D. Colwell (via hand delivery)
Cheryl Walker Davis, Esq. (via hand delivery w/original Exceptions)

91

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

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Hilary Glassman, Esq.
Sr. V.P. and General Counsel
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Pamela C. Polacek

Counsel to the Broadband Cable Association
of Pennsylvania

Dated this 12th day January, 2007, in Harrisburg, Pennsylvania.

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January 17, 2007

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ORIGINAL

**DOCUMENT
FOLDER**

VIA HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street - 2nd Floor
Harrisburg, PA 17102

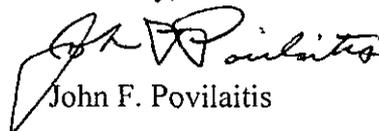
Re: Joint Application of Commonwealth Telephone Company CTSI, LLC and CTE Telecom, LLC d/b/a Commonwealth Long Distance Company For All Approvals Under The Public Utility Code for the Acquisition By Citizens Communications Company of All of the Stock of the Joint Applicants' Corporate Parent, Commonwealth Telephone Enterprises, Inc., Docket Nos. A-310800F0010, A-311095F0005 and A-311225F0003; **RCN TELECOM PETITION FOR LEAVE TO WITHDRAW INTERVENTION AND NOTICE OF WITHDRAWAL OF PROTEST**

Dear Secretary McNulty:

Enclosed for filing please find an original and three (3) copies of the RCN Telecom Services, Inc. Petition for Leave to Withdraw Intervention and Notice of Withdrawal of Protest for filing with the Commission in the above-referenced proceeding.

Thank you for your attention to this matter.

Sincerely,


John F. Povilaitis

/ajt

Enclosure

c: Honorable Susan D. Colwell (via hand delivery)
Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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In re Joint Application of	:	
	:	
Commonwealth Telephone Company	:	A-310800F0010
CTSI, LLC, and	:	A-311095F0005
CTE Telecom, LLC d/b/a Commonwealth	:	A-311225F0003
Long Distance Company	:	
	:	
	:	
For All Approvals Under The Public Utility	:	
Code for the Acquisition By Citizens	:	
Communications Company of All of the Stock	:	
of the Joint Applicants' Corporate Parent,	:	
Commonwealth Telephone Enterprises, Inc.	:	

ORIGINAL

**RCN TELECOM PETITION FOR LEAVE TO
WITHDRAW INTERVENTION AND
NOTICE OF WITHDRAWAL OF PROTEST**

Pursuant to Section 5.94 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") regulations, 52 Pa. Code § 5.94, RCN Telecom Services, Inc. ("RCN") hereby files this *Petition for Leave to Withdraw Intervention and Notice of Withdrawal of Protest* in the above-referenced proceeding. In support of this Petition and Notice, RCN states as follows:

1. On September 29, 2006, Commonwealth Telephone Company ("Commonwealth Telephone"), CTSI, LLC and CTE Telecom, LLC d/b/a Commonwealth Long Distance Company filed a Joint Application for approval under the Public Utility Code of the acquisition by Citizens Communications Company of the Joint Applicants' corporate parent, Commonwealth Telephone Enterprises, Inc.
2. RCN filed a Protest and Petition to Intervene on October 30, 2006.
3. RCN's objections to the Joint Application have been satisfied. As a result, RCN hereby requests leave to withdraw its Protest and Petition to Intervene in this matter.

WHEREFORE, for all the reasons set forth above, RCN respectfully requests to withdraw its protest and intervention in this matter.

Respectfully submitted,



John F. Povilaitis (Attorney I.D. 28944)
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Telephone: (717) 236-7714
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Counsel for RCN Telecom Services, Inc.

Date: January 17, 2007

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Joint Application of :
Commonwealth Telephone Company, :
CTSI, LLC, and CTE Telecom, LLC : A-310800F0010
d/b/a Commonwealth Long Distance Company : A-311095F0005
for all approvals under the Public Utility Code : A-311225F0003
for the acquisition by Citizens Communications :
Company of all of the stock of the joint applicants' :
corporate parent, Commonwealth Telephone :
Enterprises, Inc. :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing documents in accordance with the requirements of 52 Pa. Code § 1.54 et seq. (relating to service by a participant).

VIA FIRST CLASS and ELECTRONIC MAIL

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Date: January 17, 2007



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January 18, 2007

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

VIA HAND DELIVERY

DOCUMENT
FOLDER

RE: Joint Application of Commonwealth Telephone Company, CTSI, LLC and CTE Telecom, LLC d/b/a Commonwealth Long Distance Company For All Approvals Under the Public Utility Code for the Acquisition By Citizens Communication Company of All Stock of the Joint Applicants' Corporate Parent, Commonwealth Telephone Enterprises, Inc.; Docket Nos.: A-310800F0010, A-311095F0005 and A-311225F0003

Dear Secretary McNulty:

Pursuant to the procedural schedule adopted in the above-referenced matter, parties are scheduled to exchange prepared Direct Testimony statements on January 18, 2007. On December 14, 2006, Presiding Administrative Law Judge Susan D. Colwell issued an Initial Decision dismissing the Protest and Petition to Intervene of the Broadband Cable Association of Pennsylvania ("BCAP"). BCAP filed with the Pennsylvania Public Utility Commission timely Exceptions to the Initial Decision. As a result of the Initial Decision, BCAP is not submitting Direct Testimony at this time; however, to the extent the PUC grants BCAP's Exceptions and confirms BCAP's status as a party to this matter, BCAP respectfully requests the opportunity to submit its Direct Testimony at a later date and to request other appropriate changes to the procedural schedule to ensure that its due process rights are protected.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Pursuant to Section 1.37 of the Commission's regulations, the original and three copies of this letter are submitted for filing. Please date stamp the extra copy of this letter, and kindly return it for our filing purposes. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By

Pamela C. Polacek
Pamela C. Polacek

Counsel to the Broadband Cable
Association of Pennsylvania

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PCP

Enclosures

c: Certificate of Service
Honorable Susan D. Colwell (via hand delivery)

47

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

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2007 JAN 18 AM 10:28

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Dated this 18th day January, 2007, in Harrisburg, Pennsylvania.



Pamela C. Polacek

Counsel to the Broadband Cable Association
of Pennsylvania

DATE: January 18, 2007

SUBJECT: A-310800F0010
A-311095F0005
A-311225F0003

TO: Cheryl W. Davis, Director
Office of Special Assistants

FROM: James J. McNulty
Secretary
nvl

**DOCUMENT
FOLDER**

JOINT APPLICATION OF COMMONWEALTH TELEPHONE COMPANY, CTSI, LLC &
CTE TELECOM, LLC D/B/A COMMONWEALTH LONG DISTANCE COMPANY

Copies of the Initial Decision have been served upon all parties of interest.

Exceptions have been filed by:

BROADBAND CABLE ASSOCIATION OF PA

Reply Exceptions have been received from:

JOINT APPLICANTS & CITIZENS COMMUNICATIONS COMPANY

cc: Susan Hoffner

DOCKETED
JAN 29 2007