BEFORE THE ARIZONA CORPORATION COMMISSION

DOCKETED

MOTION TO INTERVENE

In accordance with A.A.C. R14-3-105, Citizens Communications Company, on behalf of its three incumbent local exchange carrier affiliates operating in Arizona, applies to the Arizona Corporation Commission for an order granting leave to intervene in the above-captioned docket. Those three local affiliates are Frontier Citizens Utilities Rural, Frontier Communications of the White Mountains and Navajo Communications Company (collectively "Citizens").

Citizens is directly and substantially affected by the on-going proceedings in this docket. The Commission is investigating the cost of telecommunications access. Citizens is an incumbent local exchange provider in Arizona, which requests and provides access services to other telecommunications companies. As a result, Citizens has a substantial and direct interest in the outcome of this docket.

Citizens' participation in this proceeding will not unduly broaden the issues raised. The names, addresses and telephone numbers of the persons upon whom service of all documents should be made are:
For the reasons set forth above, Citizens respectfully requests that the Arizona Corporation Commission issue an order granting Citizens intervention in this proceeding.

DATED this 8th day of March, 2002.

GALLAGHER & KENNEDY, P.A.

By

Michael M. Grant
Todd C. Wiley
2575 East Camelback Road
Phoenix, Arizona 85016-9225
Attorneys for Citizens Communications Company

Original and ten copies filed this 8th day of March, 2002 with:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Copies of the foregoing hand-delivered this 8th day of March 2002, to:

Maureen Scott, Esq.
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007
Copies of the foregoing mailed this 8th day of March 2002, to:

Mary Tribby
Richard S. Wolters
AT&T
Suite 1575
1875 Lawrence Street
Denver, Colorado 80202

Scott Wakefield
RUCO
Suite 1200
2828 North Central Avenue
Phoenix, Arizona 85004

Eric S. Heath
Sprint Communications Co.
Suite 930
100 Spear Street
San Francisco, California 94105

Timothy Berg, Esq.
Theresa Dwyer, Est.
Fennemore Craig, P.C.
3003 North Central Avenue
Suite 2600
Phoenix, AZ 85012

Micheal Patten, Esq.
Roshka, Heyman & De Wulf
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, AZ 85004
Stephen Duffy, Esq.
Ridge & Isaacson P.C.
3101 N. Central Avenue
Suite 1090
Phoenix, AZ 85012-2638

Tom Campbell, Esq.
Lewis & Roca
40 N. Central Avenue
Phoenix, AZ 85004

Brian Thomas
Time Warner Telecom, Inc.
520 S.W. 6th Avenue, Suite 300
Portland, Oregon 97204

By: Beth Oakley