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February 1, 2010

Ms. Mary Jo Kunkle
Michigan Public Service Commission
6545 Mercantile Way
PO Box 30221
Lansing, MI 48909

Re: The Application of Climax Telephone Company for
Approval of its Total Service Long-Run Incremental Cost Study
MPSC Case No. U-16192

Dear Ms. Kunkle:

Enclosed, for filing, please the Notice of Intent to Participate of T-Mobile Central LLC, in the above-captioned proceeding. Proof of Service upon the Parties of Record is also enclosed.

Very truly yours,

CLARK HILL PLC

Haran C. Rashes

HCR:pat
Enclosure

cc: Parties of Record

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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|---|------------------|
| In the Matter of the Application of Climax) | |
| Telephone Company for Approval of a Total) | Case No. U-16192 |
| <u>Service Long-Run Incremental Cost Study.</u>) | |

**NOTICE OF INTENT TO PARTICIPATE OF
T-MOBILE CENTRAL LLC**

T-Mobile Central LLC (“T-Mobile”), pursuant to the January 25, 2010 Opinion and Order of the Michigan Public Service Commission (“Commission”) in the above-captioned proceeding, hereby files this Notice of Intent to Participate in this case as a full party and states as follows:

1. T-Mobile is a commercial mobile radio service provider (“CMRS”) licensed by the Federal Communications Commission (“FCC”) and provides cellular telecommunications services in the State of Michigan.

2. On January 20, 2010, Climax Telephone Company (“Climax”) filed a petition with the Commission entitled “Application of Climax Telephone Company For Approval of its Total Service Long Run Incremental Cost Study” (the “Application”). In this Application, Climax seeks approval of a total service long run incremental cost (“TSLRIC”) study in order to increase the rates it charges for the transport and termination of local calls.

3. On January 25, 2010, the Commission issued an Opinion and Order requiring interested parties to file a Notice of Intent to Participate in this docket by February 1, 2010.

4. Though the Commission requested that parties file a Notice of Intent to Participate, if intervention were required, T-Mobile meets the two prong test for standing

adopted by this Commission as set forth in *Association of Data Processing Service Organizations Inc. v. Camp*, 397 US 150; 90 S Ct; 250 L Ed 184 (1970). T-Mobile is able to show that: (i) it would likely suffer an injury in fact; and (ii) that its interests allegedly endangered are within the zone of interest to be protected or regulated by the state.

5. T-Mobile exchanges local calls with local exchange carriers such as Climax, which involve intercarrier compensation. As a result, the rates established from any TSLRIC study considered in this case will impact the rates charged by Climax and therefore, will financially impact T-Mobile.

6. Additionally, the methodology employed by the Commission to investigate Climax's cost study could impact other rates imposed in Michigan.

7. T-Mobile will be affected by the outcome of this proceeding, and has an interest that cannot be adequately protected or represented by any other party. T-Mobile is unique in that it gives the perspective of exclusively offering CMRS and does not operate a local exchange subsidiary or an interexchange subsidiary in the State of Michigan.

8. Accordingly, in the alternative, T-Mobile requests permission to intervene as a party to this proceeding and to participate to the full extent permitted under the Commission's rules.

9. T-Mobile respectfully requests that it be served with all pleadings and other documents in this case, including, without limitation, the confidential version of all pleadings and cost studies (subject to any applicable protective order or a mutually acceptable confidentiality agreement).

10. The name, address and telephone number of the person to whom communications should be sent is as follows:

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WHEREFORE, T-Mobile respectfully requests that the Michigan Public Service Commission grant its Notice of Intent to Participate, and that it be treated as a full party in this proceeding.

Respectfully Submitted,

By: _____
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Date: February 1, 2010

Attorneys For T-Mobile Central LLC

SERVICE LIST
MPSC Case No. U-16192

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**Sprint Communications Company L.P.,
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