

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Illinois Independent Telephone Association	)	
	)	
	)	
	)	
Petition to update the Section 13-301(1)(d)	)	Docket No. 11-0211
Illinois Universal Service Fund and to implement	)	
Intrastate Switched Access Charge reform as	)	
described herein and for other relief	)	

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**MCLEODUSA TELECOMMUNICATIONS SERVICES, L.L.C. D/BA  
PAETEC BUSINESS SERVICES  
PETITION TO INTERVENE**

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McLeodUSA Telecommunications Services, L.L.C. d/b/a Paetec Business Services (“Paetec”), by its attorney, hereby petitions to intervene in the above captioned proceeding, pursuant to Section 200.200 of the Rules of Practice of the Illinois Commerce Commission (“Commission”). In support of its Petition, Paetec states as follows:

1. Paetec is a corporation duly authorized to do business in the State of Illinois. Paetec has its principal offices at 600 Willowbrook Office Park, Fairpoint, New York 14450.
2. Paetec is a telecommunications carrier authorized to provide competitive local exchange and interexchange telecommunications services within Illinois, and is also an Interconnected VoIP Provider.
3. Paetec is interested in this proceeding because the ruling in this proceeding will affect the rights and interests of Paetec.
4. In order to protect the rights and interests of Paetec, the company should be granted to intervene as a party to this proceeding and participate fully as a party of record in the

above-referenced proceeding, including the right to file briefs, present testimony and exhibits, and cross-examine witnesses.

5. Should this petition be granted, Paetec requests that the Commission and all parties please include the following on the service list:

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For the foregoing reasons, McLeodUSA Telecommunications Services, L.L.C. d/b/a Paetec Business Services respectfully requests that this Commission grant its Petition to Intervene.

Respectfully Submitted,

By:



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One of its attorneys

Henry T. Kelly, Esq.  
Catie James, Esq.  
Kelley Drye & Warren LLP  
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Chicago, IL 60606

William Haas  
McLeodUSA Telecommunications  
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**NOTICE OF FILING**

Please take notice that on April 25, 2011, I caused to be filed via the Illinois Commerce Commission's eDocket, **McLeodUSA Telecommunications Services, L.L.C. d/b/a Paetec Business Services' Verified Petition to Intervene**. A copy of the foregoing documents are hereby served upon you.



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Henry T. Kelly, attorney for the  
Illinois Power Agency

**CERTIFICATE OF SERVICE**

I, Henry T. Kelly, an attorney, on oath state that I served a copy of **McLeodUSA Telecommunications Services, L.L.C. d/b/a Paetec Business Services' Verified Petition to Intervene** on the service list maintained on the Illinois Commerce Commission's eDocket system for the instant docket via electronic delivery on April 25, 2011.



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