## STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

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In Re: Implementation of the Requirements	)		
Of the Federal Communications Commission's	)	Docket No.	3350
Triennial Review Order CC Docket No. 98-147	)		
	)		

## MOTION TO INTERVENE OF RNK, INC. D/B/A RNK TELECOM

Pursuant to Rhode Island Public Utilities Commission ("Commission") Implementation notice dated September 18, 2003, RNK, Inc. d/b/a RNK Telecom ("RNK") respectfully requests the Commission to grant RNK the right to intervene in the above-referenced matter. In support of its Motion to Intervene, RNK states as follows:

- 1. RNK is authorized by the Commission to provide telecommunications services to end users in Rhode Island as a Class I competitive local exchange carrier.
- 2. RNK will be directly affected by any decision made by the Commission in this proceeding. This proceeding will have a substantial impact on the price and availability of unbundled network elements in Rhode Island and, as such, will impact any future competitive choices RNK will make for future expansion of competitive services to Rhode Island consumers. Further, RNK may be able to provide a unique perspective into the competitive barriers facing small carriers in Rhode Island.
- 3. As a small competitive facilities-based local exchange carrier in Rhode Island, no other party can represent RNK's interests effectively.

WHEREFORE, for the reasons set forth and consistent with Section 1.13(a) of the

Commission's Rules of Practice and Procedure, RNK respectfully requests that the Commission

grant RNK's Motion to Intervene.

Respectfully submitted,

RNK, Inc. d/b/a RNK Telecom

By its attorney,

<u>/S/</u>

Michael S. Tenore, Esq. Counsel (RI Attorney No. 6783) RNK, Inc. d/b/a RNK Telecom 333 Elm Street, Suite 310 Dedham, MA 02026 P (781) 613-6119 F (781) 297-9836

Dated: September 29, 2003

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## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 30 <sup>th</sup> day of September, 2003, I did cause true
and accurate copy of the within Motion to Intervene to be served by first class mail, postage
paid, upon each party included on the interim service list for this docket dated September 23'
2003.
/ <u>S/</u>
Michael S. Tenore