

**THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Proceeding by the Department of Telecommunications and )  
Energy on its own Motion to Develop Requirements for Mass )  
Migrations of Telecommunications Service End-Users )  
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D.T.E. 02-28

**PETITION TO INTERVENE OF RNK, INC. D/B/A RNK TELECOM**

Pursuant to G.L. c. 30A ' 10 and 220 C.M.R. 1.03 of the Department's Procedural Rules, RNK, Inc. d/b/a RNK Telecom (ARNK Telecom®) petitions to intervene as a participant in the above-captioned proceeding. In support of this petition, RNK Telecom states as follows:

1. RNK Telecom is a competitive local exchange carrier (ACLEC®) with its principal place of business at 333 Elm Street, Dedham, Massachusetts 02026. RNK Telecom is a facilities-based and resale CLEC focused on delivering a full array of voice and data services to both residential and business customers in Massachusetts.
2. RNK Telecom wishes to be heard on possible discontinuation of service notice requirements that may be at issue, in particular, the responsibilities of CLECs under the proposed guidelines.
3. RNK Telecom, as a CLEC, will be directly, significantly, and substantially impacted by these guidelines. The proposed new guidelines might present a significant financial burden to CLECs already in difficulty and might result in more customers in the Commonwealth being impacted.
4. As a small CLEC offering service via resale, unbundled network elements, and its own facilities, RNK feels that it can address all three types of scenarios involving the moving of customers to alternative providers, and that it would serve the public interest if RNK was heard before the Department concerning issues of importance to small CLECs.
5. RNK Telecom intends to participate as a full participant and take part in all issues that may substantially and specifically affect RNK Telecom.

WHEREFORE, RNK Telecom, by and through its attorneys, respectfully requests that this Petition to Intervene be granted and that RNK Telecom be accorded full participant intervention status in this proceeding.

Respectfully Submitted,

RNK, Inc d/b/a RNK Telecom

By:

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