

ORIGINAL

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

COMMISSIONERS

KRISTIN K. MAYES, Chairman
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

2010 OCT 14 P 1:00

AZ CORP COMMISSION
DOCKET CONTROL

PETITION OF I-WIRELESS, LLC FOR
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE
STATE OF ARIZONA FOR THE LIMITED
PURPOSE OF OFFERING LIFELINE SERVICE
TO QUALIFIED HOUSEHOLDS

DOCKET NO. T-20538A-10-0332

MOTION TO INTERVENE

1 Pursuant to A.A.C. R14-3-105 the Arizona Local Exchange Carriers Association
2 (“ALECA”) hereby moves to intervene in the above-captioned case.

3 **I Service**

4 Please serve all documents on:

5 Craig A. Marks
6 Craig A. Marks, PLC
7 10645 N. Tatum Blvd., Ste. 200-676
8 Phoenix, Arizona 85028
9 (480) 367-1956 (Direct)
10 (480) 367-1956 (Fax)
11 Craig.Marks@azbar.org
12 Attorney for ALECA

Arizona Corporation Commission
DOCKETED
OCT 14 2010

DOCKETED BY [Signature]

13 **II Interest in Proceeding**

14 ALECA is comprised of small telephone companies and member-owned cooperatives,
15 all of which are providing local exchange telecommunications services to customers in rural,
16 high cost areas of Arizona, and all of which are “rural telephone companies” as defined by the
17 Communications Act of 1934, as amended (the “Act”) 47 U.S.C. 0 153(37). ALECA’s members
18 are:

- 19 • Fort Mojave Telephone Company;
- 20 • Frontier Communications Corporation;

- 1 • Gila River Telecommunications, Inc;
- 2 • Hopi Telecommunications, Inc.;
- 3 • Midvale Telephone Exchange, Inc.;
- 4 • San Carlos Apache Telecommunications Utility, Inc.;
- 5 • South Central Communications;
- 6 • Table Top Telephone Company, Inc;
- 7 • TDS;
- 8 • Tohono O'odham Utility Authority; and
- 9 • Valley Telephone Cooperative; and
- 10 • Zona Communications.¹

11 Each ALECA member, including its Tribally-owned members, receives support from the
12 Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each also provides
13 discounted Lifeline telephone service and receives compensation for the discounts from the
14 FUSF. I-wireless, LLC ("i-wireless") seeks designation as an Eligible Telecommunications
15 Carrier ("ETC") so that it may provide Lifeline wireless telephone service to eligible customers
16 in Arizona. ALECA is concerned that i-wireless' Lifeline offering may unfairly duplicate the
17 similar offerings of its member companies, cause the FUSF requirements to grow to the point
18 where its member companies' FUSF compensation is endangered, and undermine public support
19 for the FCC's universal service programs.

20 ALECA reserves the right to take positions on any other issues in this case.

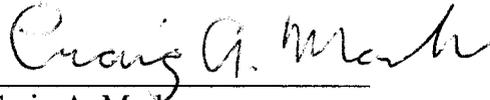
21 No other party can adequately represent ALECA's interests.

22 **III Requested Relief**

23 ALECA asks that the Commission grant its Motion to Intervene.

¹ Fort Mohave Telecommunications, Gila River Telecommunications, Hopi Telecommunications, San Carlos Apache Telecommunications Utility and the Tohono O'odham Utility Authority are tribally-owned telephone Companies, which are not subject to the jurisdiction of the Arizona Corporation Commission.

1 RESPECTFULLY SUBMITTED on October 14, 2010.
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6 Craig A. Marks
7 Craig A. Marks, PLC
8 10645 N. Tatum Blvd., Ste. 200-676
9 Phoenix, Arizona 85028
10 (480) 367-1956 (Direct)
11 (480) 367-1956 (Fax)
12 Craig.Marks@azbar.org
13 Attorney for Westcor/Globe
14

15 **Original** and 13 copies **filed**
16 on October 14, 2010, with:

17
18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington
21 Phoenix, Arizona 85007
22

23 **Copy** of the foregoing **mailed**
24 on October 14, 2010, to:

25
26 Lance J.M. Steinhart, P.C.
27 1720 Windward Concourse
28 Suite 115
29 Alpharetta, Georgia 30005
30

31 By:

32 
33 Craig A. Marks