

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

GARY PIERCE, Chairman
PAUL NEWMAN
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BOB STUMP
BRENDA BURNS

2011 JUL 12 P 12:53

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

JUL 12 2011

DOCKETED BY *[Signature]*

IN THE MATTER OF THE APPLICATION OF
TERRACOM, INC. FOR DESIGNATION AS
AN ELIGIBLE TELECOMMUNICATIONS
CARRIER ON A WIRELESS BASIS (LOW
INCOME ONLY)

DOCKET NO. T-20802A- 11-0174

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

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;
- 21 • Gila River Telecommunications, Inc.;

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

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

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

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

21 **III Requested Relief**

22 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 July 12, 2011.
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15 **Original and 13 copies filed**
16 on July 12, 2011, with:

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

23 **Copy of the foregoing e-mailed**
24 on July 12, 2011, to:

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29 Phoenix, AZ 85004-2262
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33 By: 
34 Craig A. Marks
35