

INTERVENTION ORIGINAL



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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS:

GARY PIERCE, Chairman
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP
BRENDA BURNS

2011 JUL 28 P 4: 30

AZ CORP COMMISSION
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Arizona Corporation Commission

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JUL 28 2011

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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-20538A10-0332

MOTION TO INTERVENE

Pursuant to A.A.C. R14-3-105 the National Tribal Telecommunications Association ("NTTA") hereby moves to intervene in the above-captioned case.

I. Service

Please serve all documents on:

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Attorney for NTTA

II. Interest in Proceeding

NTTA is comprised of 10 tribally-owned telecommunications companies providing telecommunications services within their reservations. Six of NTTA's members are providing local exchange telecommunications services (including discounted Lifeline service) to customers in rural, high cost areas of Arizona, and receive support from the Federal Universal Service Fund in the form of High Cost Support. All

of NTTA's members are "rural telephone companies" as defined by the Communications Act of 1934, as amended (the "Act") 47 U.S.C. 153(37).

NTTA's members are:

- Fort Mojave Telephone Company (AZ)
- Gila River Telecommunications, Inc. (AZ)
- Hopi Telecommunications, Inc. (AZ)
- San Carlos Apache Telecommunications Utility, Inc. (AZ)
- Saddleback Telecommunications, Inc. (AZ)
- Tohono O'odham Utility Authority (AZ)
- Cheyenne River Sioux Telecommunications Authority (SD)
- Mescalero Apache Telecommunications, Incorporated (NM)
- Standing Rock Sioux Telecommunications, Incorporated (SD)
- Associate Tribal Member, Warm Springs Telecommunications, Incorporated (OR)

The proposed intervenor has strong interests in the proceeding because the applicant proposes to target low-income customers on some of its members' reservations and the proposed intervenor:

- (a) includes tribally owned and regulated carriers who are already providing discounted Lifeline telephone services within their service areas;
- (b) has an interest in protecting the unique consumer interests of telephone subscribers on tribal lands;
- (c) has an interest in asserting the sovereign rights of tribal nations to regulate and control business activities taking place within their boundaries; and
- (d) has an interest in ETC obligations, quality of service issues and the allocation of Federal Universal Service Funds on tribal lands.

The proposed intervenor reserves the right to take positions on any other issues in this case.

No other party can adequately represent the specific interests of the proposed intervenor.

III. Requested Relief

NTTA hereby requests that the Commission grant its Motion to Intervene.

RESPECTFULLY SUBMITTED on July 28, 2011.



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COPY of the foregoing mailed
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