

ORIGINAL

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

BOB STUMP, Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

2013 FEB 19 P 12:27

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF
TOTAL CALL MOBILE, INC. FOR LIMITED
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER.

DOCKET NO. T-20870A-12-0500

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.;
- 22 • Hopi Telecommunications, Inc.;

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

9 Each ALECA member, including its Tribally-owned members, receives support from the
10 Federal Universal Service Fund (“FUSF”) in the form of High Cost Support. Each also provides
11 discounted Lifeline telephone service and receives compensation for the discounts from the
12 FUSF. Total Call Mobile, Inc. (“Total Call”) seeks designation as an Eligible
13 Telecommunications Carrier (“ETC”) so that it may provide the services identified in its
14 Application to eligible customers in Arizona. ALECA is concerned that Total Call’s proposed
15 service request may raise jurisdictional issues concerning the provision of services on tribal
16 lands.

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

18 No other party can adequately represent ALECA’s interests.

19 **III Requested Relief**

20 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 February 19, 2013.
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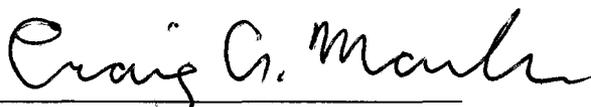
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12 Craig.Marks@azbar.org
13 Attorney for ALECA
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15 **Original** and 13 copies **filed**
16 on February 19, 2013, with:

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 February 19, 2013, to:

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27 Bryan Cave LLP
28 Two N. Central Avenue, Suite 2200
29 Phoenix, AZ 85004-440
30 sblutz@bryancave.com
31

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33 By: 
34 Craig A. Marks
35