



BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

SUSAN BITTER SMITH, Chairman
BOB STUMP
ROBERT BURNS
DOUG LITTLE
TOM FORESE

Arizona Corporation Commission 2015 MAR -9 P 2:29

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MAR 09 2015

AZ CORP COMMISSION
DOCKET CONTROL

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IN THE MATTER OF THE APPLICATION
OF TAG MOBILE, 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-20922A-15-0007

MOTION TO INTERVENE

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

I Service

Please serve all documents on:
Craig A. Marks
Craig A. Marks, PLC
10645 N. Tatum Blvd., Ste. 200-676
Phoenix, Arizona 85028
(480) 367-1956 (Direct)
(480) 304-4821 (Fax)
Craig.Marks@azbar.org
Attorney for ALECA

II Interest in Proceeding

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

- Fort Mojave Telephone Company;

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

12 Each ALECA member, including its Tribally-owned members, receives support from the
13 Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each also provides
14 discounted Lifeline telephone service and receives compensation for the discounts from the
15 FUSF. TAG Mobile, L.L.C. ("TAG Mobile") seeks designation as an Eligible
16 Telecommunications Carrier ("ETC") so that it may provide the services identified in its
17 Application to eligible customers in Arizona. ALECA is concerned that TAG Mobile's proposed
18 service request may raise jurisdictional issues concerning the provision of services on tribal lands
19 without tribal authorization.

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 March 9, 2015.
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6 Craig A. Marks
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9 Phoenix, Arizona 85028
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12 Craig.Marks@azbar.org
13 Attorney for ALECA
14

15 **Original** and 13 copies **filed**
16 on March 9, 2015, with:

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

23 **Copy** of the foregoing **mailed and e-mailed**
24 on March 9, 2015, to:

25
26 Michael W. Patten
27 Snell & Wilmer
28 400 E Van Buren St #1900
29 Phoenix, AZ 85004-2202