

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Investigation by the Department on its Own )  
Motion in to the Implementation in Massachusetts of ) D.T.C. 13-4  
the Federal Communications Commission’s Order )  
Reforming the Lifeline Program )  
\_\_\_\_\_ )

**PETITION FOR LEAVE TO INTERVENE  
OF T-MOBILE NORTHEAST LLC**

Pursuant to G.L. c. 30A, §11 and 220 CMR Section 1.03, T-Mobile Northeast LLC, a wholly-owned subsidiary of T-Mobile USA, Inc., (“T-Mobile” or the “Company”) hereby petitions the Department of Telecommunications and Cable (the “Department”) for leave to intervene in the above-referenced proceeding. In support of this motion, T-Mobile states the following:

1. T-Mobile is a Delaware corporation with a principle place of business at 12920 S.E. 38th Street, Bellevue, WA, 98006.
2. T-Mobile provides wireless voice and data services in the Commonwealth of Massachusetts pursuant to radio licenses issued by the Federal Communications Commission and network infrastructure owned/operated by T-Mobile. T-Mobile is authorized to do business and maintains Certificate of Good Standing with the Secretary of the Commonwealth, Corporation Division.
3. On August 30, 2012, the Department granted T-Mobile limited designation as an Eligible Telecommunications Carrier for purposes of low income support only. Pursuant to that designation, T-Mobile currently offers Lifeline services to eligible Lifeline subscribers in the Commonwealth.

4. By order entered on April 1, 2013, the Department opened this docket as “to establish appropriate requirements and procedures to implement the *Lifeline Reform Order* in Massachusetts, advance universal service and safeguard the USF.”

5. The Department may allow any person that “may be substantially and specifically affected” by a proceeding to intervene as a party. G.L. c. 30A, §10; *see also* 220 CMR §1.03(1).

6. T-Mobile may be substantially and specifically affected by the Department’s investigation and findings in this proceeding regarding the implementation of the *Lifeline Reform Order* in Massachusetts.

7. T-Mobile intends to fully participate in this proceeding and will, as necessary, submit written comments, participate in public hearing(s) and/or present testimony to protect its interests and facilitate the Department’s investigation into the implementation of the *Lifeline Reform Order* in Massachusetts.

8. T-Mobile’s interests are unique and cannot be adequately represented by any other party.

9. Accordingly, T-Mobile moves for leave to intervene and participate in this proceeding consistent with the ground rules and procedures established by the hearing officer.

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WHEREFORE, T-Mobile respectfully requests that the Department grant this petition for leave to intervene and take such other actions as may be necessary and appropriate.

Respectfully submitted,

T-MOBILE NORTHEAST LLC

By its attorneys,



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Dated: April 29, 2013