

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Investigation by the Department on
its Own Motion into the Implementation in
Massachusetts of the Federal
Communications Commission's Order
Reforming the Lifeline Program

D.T.C. 13-4

VIRGIN MOBILE USA, L.P. PETITION FOR INTERVENTION

Pursuant to 220 CMR § 1.03, Virgin Mobile USA, L.P. ("Virgin Mobile") respectfully requests that the Massachusetts Department of Telecommunications and Cable ("Department") grant Virgin Mobile's Petition for Intervention in the above captioned matter. Virgin Mobile respectfully submits that all the factors for intervenor status, as set forth in 220 C.M.R. § 1.03, support granting the instant Petition. As the basis for its request, Virgin Mobile states as follows:

1. Virgin Mobile USA, L.P. ("Virgin Mobile") has been designated by the Department to provide wireless Lifeline service in Massachusetts as an Eligible Telecommunications Carriers ("ETC").¹
2. On April 1, 2013, the Department initiated the above captioned docket on its own Motion.
3. Virgin Mobile intends to participate in this proceeding.

¹ See *In the Matter of the Application of Virgin Mobile USA, L.P.'s Petition for Limited Designation as an Eligible Telecommunications Carrier*, D.T.C. 10-11, Order Approving Petition (Sept. 9, 2011) ("Virgin Mobile Order").

4. The interests of justice would be served by permitting this intervention. No other party can adequately represent Virgin Mobile's interests in this proceeding. No party would be unduly prejudiced by Virgin Mobile's intervention in this proceeding.

5. Virgin Mobile requests that all communications, correspondence, orders and other documentation relating to this proceeding be directed to both of Virgin Mobile's attorneys listed below. Virgin Mobile also requests that both of its attorneys be placed on the official service list compiled for the purposes of this proceeding. WHEREFORE, Virgin Mobile respectfully requests that the Department grant its Petition for Intervention in this proceeding.

Respectfully submitted,

Virgin Mobile USA, L.P.

By its Attorneys



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