COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of the State 911 Department for Adjustment of the Enhanced 911 Surcharge	))))	D.T.C 14-3

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. As a carrier whose communications services are capable of accessing and utilizing an enhanced 911 system, T-Mobile is subject to the Enhanced 911 Surcharge pursuant to Massachusetts General Law c. 6A, 18H(b).

4. On September 12, 2014, the State 911 Department petitioned the Department to adjust the Enhanced 911 Surcharge, for each subscriber or end-user whose communication services are capable of accessing and utilizing the enhanced 911 system, to $1.25 to provide for expenses associated with 911 services pursuant to G.L. c. 6A, § 18H (b).

5. On September 23, 2014, the Department opened the above-captioned docket to investigate the State 911 Department request as a formal adjudicatory proceeding conducted under G.L. 30A and 220 C.M.R. § 1.00 et seq.

6. 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).

7. T-Mobile may be substantially and specifically affected by the Department's investigation and findings in this proceeding regarding the State 911 Department's petition to adjust the Enhanced 911 Surcharge.

8. 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 of the State 911 Department's petition to adjust the Enhanced 911 Surcharge.

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

10. 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.

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

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