

**Sprint Nextel**  
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**Garnet Goins**  
Director, State Regulatory Northeast  
Region  
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**BY FEDERAL EXPRESS AND ELECTRONIC MAIL**

August 24, 2006

Mary L. Cottrell  
Secretary, Administration Division  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110-2212

RE: Sprint Spectrum, L.P. and Nextel of the Mid-Atlantic, Inc. Petition for  
Intervention in D.T.E. 06-70

Dear Secretary Cottrell,

Please find enclosed for filing an original and four (4) copies of Sprint Spectrum, L.P. and Nextel of the Mid-Atlantic, Inc.'s (collectively, "Sprint Nextel") Petition for Intervention into the Investigation to Establish the Maximum Rates and Fees to be Charged by the Massachusetts Turnpike Authority to Wireless Providers for the Placement and Use of Wireless Attachments in the Central Artery Tunnels.

Please return a filed-stamped copy of the Petition for Intervention to me in the enclosed self-addressed, postage-prepaid envelope. Thank you for your attention to this matter. If you have any questions concerning this request, please do not hesitate to contact me at (703) 433-4248.

Sincerely,

Garnet M. Goins

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

INVESTIGATION TO ESTABLISH THE MAXIMUM )  
RATES AND FEES TO BE CHARGED BY THE )  
MASSACHUSETTS TURNPIKE AUTHORITY TO ) D.T.E.06-70  
WIRELESS PROVIDERS FOR THE PLACEMENT )  
AND USE OF WIRELESS ATTACHMENTS IN THE )  
CENTRAL ARTERY TUNNELS )

**SPRINT SPECTRUM, L.P. AND NEXTEL OF THE MID-ATLANTIC, INC.  
PETITION FOR INTERVENTION**

Pursuant to the Vote and Order to Open Investigation issued August 11, 2006, Sprint Spectrum, L.P. and Nextel of the Mid-Atlantic, Inc. (collectively, "Sprint Nextel") respectfully requests that the Massachusetts Department of Telecommunications and Energy ("DTE") grant its Petition for Intervention in the above-referenced investigation. As the basis for its request, Sprint Nextel states as follows:

1. Sprint Nextel operates as a facilities-based commercial mobile radio service ("CMRS") provider pursuant to licenses and spectrum issued by and purchased from the Federal Communications Commission offering a broad range of wireless services in the Commonwealth of Massachusetts.

2. As a CMRS provider in Massachusetts, Sprint Nextel has a significant interest in the placement and use of wireless attachments in the central artery tunnels for convenience, necessity and public safety. The wireless industry is a highly competitive market that emphasizes the importance of wireless coverage in areas commonly used by the general public, including the central artery tunnels. These strong competitive pressures force wireless carriers, including Sprint Nextel, to offer coverage at the quality levels demanded by consumers.

3. Sprint Nextel's participation in the process will help ensure that just and reasonable rates and fees are established for the MTA to charge CMRS providers for the placement and use of wireless attachments in the central artery tunnels.

4. The interests of justice would be served by permitting this intervention. No other party can adequately represent Sprint Nextel's interests in this proceeding. No party will be unduly prejudiced by Sprint Nextel's intervention in this proceeding. Additionally, Sprint Nextel's intervention would have no adverse impact on the conduct of the DTE's investigation.

5. Sprint Nextel requests that all communications, correspondence, orders and other documentation relating to this investigation be directed to the undersigned attorney. Sprint Nextel also requests that the undersigned attorney be placed on the official service list compiled for purposes of this investigation.

WHEREFORE, Sprint Nextel respectfully requests that the DTE grant its Petition for Intervention in this investigation.

Respectfully submitted,

COUNSEL FOR SPRINT SPECTRUM, L.P. AND  
NEXTEL OF THE MID-ATLANTIC, INC.

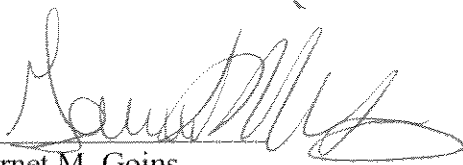
A handwritten signature in dark ink, appearing to read 'Garnet Goins', is written over a horizontal line.

Garnet Goins  
2001 Edmund Halley Drive  
Reston, VA 20010  
Garnet.goins@sprint.com

Dated: August 24, 2006

Certificate of Service

I hereby certify that a copy of the foregoing Intervention this day has been deposited in the United States Mail, postage prepaid to all persons listed on the Notice of Investigation and Public Hearing in this Docket this 24th day of August, 2006.



Garnet M. Goins