



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

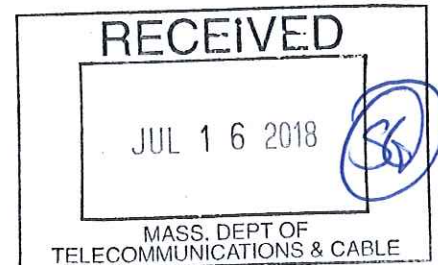
ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

MAURA HEALEY
ATTORNEY GENERAL

(617) 727-2200
(617) 727-4765 TTY
www.mass.gov/ago

July 16, 2018

Shonda D. Green, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500



Re: *Petition of Recipients of Collect Calls from Prisoners at Correctional Institutions,*
D.T.C. 11-16

Dear Secretary Green:

Enclosed please find the Attorney General's Notice of Intervention, Appearance of Counsel, and Certificate of Service. Please file according to your usual practice. Thank you for your assistance in this matter.

Sincerely,

/s/ Timothy J. Reppucci

Timothy J. Reppucci
Assistant Attorney General

Enclosures

cc: Rosalie Fazio, Hearing Officer
Service List

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

**PETITION OF RECIPIENTS OF
COLLECT CALLS FROM PRISONERS
AT CORRECTIONAL INSTITUTIONS**

D.T.C. 11-16

ATTORNEY GENERAL'S NOTICE OF INTERVENTION

Maura Healey, as she is the Attorney General of the Commonwealth of Massachusetts, hereby gives notice of intervention as of right in the above-captioned matter under the authority specifically granted her by G.L. c. 12, §§10 and 11E and under her common law authority to represent and protect the public interest.

The Attorney General, as the chief law enforcement officer of the Commonwealth, has “broad common law and statutory powers to represent the public interest.” *Commonwealth v. Mass CRINC*, 392 Mass. 79, 88 (1984); *see Sec’y of Admin. & Fin. v. Attorney General*, 367 Mass. 154, 159 (1975) (*quoting Commonwealth v. Kozlowsky*, 238 Mass. 379, 389 (1921)). “[T]he Attorney General has a general statutory mandate, in addition to any specific statutory mandate, to protect the public interest.” *Mass CRINC*, 392 Mass. at 88 (*citing* G.L. c. 12, § 10); *see also Lowell Gas Co. v. Attorney General*, 377 Mass. 37, 48 (1979) (holding that the Attorney General has a “common law duty to represent the public interest and to enforce public rights”). The Attorney General’s authority to protect the public interest applies to this administrative proceeding, as the Legislature did not intend “to vary the power and duty of the Attorney General to control the conduct of litigation involving the interests of the Commonwealth depending on the forum in which he appears.” *Feeney v. Commonwealth*, 373 Mass. 359, 367 (1998). The Attorney General’s Office’s interpretation of its own authority should be given the

same significant deference of any administrative agency in carrying out a power granted by the legislature. *Dowling v. Registrar of Motor Vehicles*, 425 Mass. 523, 525 (1997) (quoting *Mass. Med. Soc. v. Comm'r of Ins.*, 402 Mass. 44, 62 (1988)).

Respectfully submitted,

MAURA HEALEY
ATTORNEY GENERAL

By: /s/ Timothy J. Reppucci
Timothy J. Reppucci
Assistant Attorney General
Massachusetts Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
(617) 727-2200

Dated: July 16, 2018