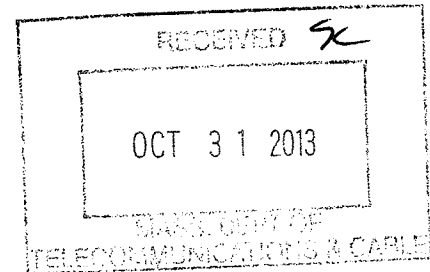




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October 30, 2013



Catrice C. Williams, Secretary
Massachusetts Department of
Telecommunications and Cable
1000 Washington Street
8th Floor, Suite 820
Boston, Massachusetts 02118-6500

Re: D. T. C. 13-1; Telrite Corporation d/b/a Life Wireless

Dear Ms. Williams:

Enclosed for filing in the above referenced Docket is the Company's Motion to Stay the proceedings in this docket.

If you have any questions or need additional information, please call me.

Sincerely,

J. Andrew Gipson

JAG/ssb

cc: Brian Lisle

{JX080094.1}

JONES WALKER LLP

ALABAMA • ARIZONA • CALIFORNIA • DISTRICT OF COLUMBIA • FLORIDA • GEORGIA • LOUISIANA • MISSISSIPPI • NEW YORK • OHIO • TEXAS

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

Case No. D.T.C. 13-1

TELRITE CORPORATION D/B/A LIFE
WIRELESS FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER IN THE STATE OF
MASSACHUSETTS FOR THE LIMITED
PURPOSE OF OFFERING WIRELESS
LIFELINE SERVICE TO QUALIFIED
HOUSEHOLDS (LOW INCOME ONLY)

MOTION TO STAY

COME NOW, Telrite Corporation d/b/a Life Wireless ("Telrite") by and through its undersigned attorneys, pursuant to Massachusetts Public Utilities Regulations 220 CMR 1.04 Section 5(a), and files this Motion to Stay the proceeding in this matter. In support hereof, Telrite would show unto the Massachusetts Department of Telecommunications and Cable as follows:

On January 7, 2013, Telrite filed with the Department its Application for Designation as an Eligible Telecommunications Carrier for the limited purpose of offering wireless Lifeline service to qualified households (low income only).

In the interim, Telrite has re-assessed its plans for expansion in Massachusetts. Telrite has made the business decision to request deferral of action on its pending ETC application until after the Universal Service Administrative Company ("USAC") has completed the process of building and implementing the National Lifeline Accountability Database ("NLAD"). The NLAD is expected to assist all eligible telecommunications carriers with promoting and ensuring the avoidance of fraud in accordance with state and federal policies and should prove to be

particularly helpful with regard to customers who may seek to obtain two Lifeline benefits in two different states.

The NLAD is expected to be implemented in the first quarter of 2014; however, the precise date of implementation is uncertain, and potential delays caused by the federal budget crisis have rendered it even more uncertain. Due to the uncertainty engendered by this situation, Telrite is unable to provide the Department an expected date of NLAD implementation and thus believes it would be impracticable to request a definitive procedural schedule in this proceeding at this time. This motion promotes the interests of administrative efficiency, since it avoids the need for the establishment of a procedural schedule that may require alteration, which would potentially burden the Commission and its Staff with an ongoing but delayed proceeding for a period of several months.

WHEREFORE, Telrite respectfully requests that this Department enter an Order granting its Motion to Stay. Telrite also requests any further relief that the Department deems just and proper.

Respectfully submitted this 30th day of October, 2013.

JONES WALKER LP

By: 

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**ATTORNEY FOR TELRITE CORPORATION
D/B/A LIFE WIRELESS**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **TELRITE CORPORATION D/B/A LIFE WIRELESS'S MOTION TO STAY** was filed with the Massachusetts Department of Telecommunications and Cable and delivered on October 30, 2013 via email to each of the following:

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