

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Investigation by the Department on its)	
Own Motion into the Implementation in)	D.T.C. 13-4
Massachusetts of the Federal)	
Communications Commission's Order)	
Reforming the Lifeline Program)	

**PETITION FOR PARTY STATUS
OF YOURTEL AMERICA, INC.**

Introduction

Pursuant to 220 C.M.R. § 1.03 and the April 1, 2013 request for comments issued by the Department of Telecommunication and Cable ("Department"), YourTel America, Inc. ("YourTel" or the "Company") petitions to intervene as a party in the above-captioned docket. As grounds therefor, YourTel states as follows:

Background

1. YourTel is a national leader in providing Universal Service Fund ("USF") supported and unsupported wireless services to low income customers. YourTel is certified to provide supported Eligible Telecommunications Carrier ("ETC") Lifeline services in eight states. YourTel currently has a fully-briefed application for ETC status pending before the Department in Docket 11-1 and the Company looks forward to serving Lifeline and other customers in the Commonwealth upon Department approval.

2. On April 1, 2013, the Department issued a request for comments that solicited petitions to intervene by parties interested in developing uniform Department policies and rules applicable to Massachusetts ETC providers.

Intervention Request

3. As an ETC provider with a pending application before the Department, YourTel is keenly interested in the development of uniform, fair and reasonable regulatory requirements applicable to Massachusetts ETCs that do not unduly burden competition that benefits low income customers and the public interest. As such, YourTel has a substantial and specific interest in the development of ETC rules and policies in the Commonwealth that are reasonable, non-discriminatory and in full conformity with applicable law.

4. YourTel requests that it be granted party status, so that it will have full rights to conduct discovery, offer testimony and evidence, examine witnesses, submit written and oral arguments, and otherwise fully participate in the issues raised by this proceeding to the extent authorized by applicable law.

5. Given that YourTel operates its business in a manner different from most of its ETC competitors, the interests of YourTel cannot be adequately represented by the other parties in the proceeding.

6. At this point, YourTel does not know the extent to which it will participate in this proceeding. YourTel anticipates that participation will depend on the proposals for regulatory treatment that arise during the course of the instant proceeding.

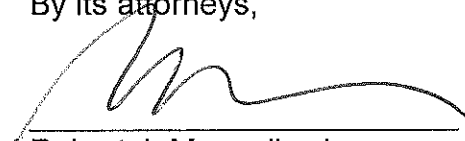
7. Notices, correspondence and pleadings in this docket should be served on the undersigned counsel for YourTel as well as the following Company representative:

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Conclusion

Accordingly, for the above-described reasons, the Department should grant the petition of YourTel to intervene as a party in this proceeding.

YOURTEL AMERICA, INC.
By its attorneys,



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