## Before the UTAH PUBLIC SERVICE COMMISSION

In the Matter of	) )	
Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Utah for the Limited Purpose of Offering Lifeline Service to Qualified Households	) ) )	Docket No. 09-2511-01
	)	

## TRACFONE WIRELESS, INC.'S RESPONSE TO PETITION TO INTERVENE OF THE UTAH RURAL TELECOM ASSOCIATION AND ASSOCIATION MEMBERS

TracFone Wireless, Inc. ("TracFone"), by its undersigned counsel, files this response to the Petition to Intervene of the Utah Rural Telecom Association and Association Members ("URTA"). TracFone does not oppose URTA's petition. URTA states in its petition that it has a significant interest in the above-captioned matter because TracFone, if designated as an ETC, would be eligible to seek support from the Utah Universal Service Fund ("USF"). By this response, TracFone clarifies that it has not sought funds from any state USF in states in which it has been designated as an ETC, and it will not seek support from the Utah USF.

Respectfully submitted,

/s/ Mitchell F. Brecher

Mitchell F. Brecher Debra McGuire Mercer GREENBERG TRAURIG, LLP 2101 L Street, NW **Suite 1000** 

Washington, D.C. 20037

Telephone: (202) 331-3100 Facsimile: (202) 331-3101 brecherm@gtlaw.com

mercerdm@gtlaw.com

Counsel for TracFone Wireless, Inc.

December 3, 2009

This is to certify that I have duly served TracFone Wireless, Inc.'s Response to Petition to Intervene of the Utah Rural Telecom Association and Association Members electronically, this 3<sup>rd</sup> day of December, 2009, on the following:

Stephen F. Meacham Callister Nebeker & McCullough 10 East South Temple Suite 900 Salt Lake City, UT 84133 sfmeacham@cnmlaw.com

Casey Coleman
Utah Public Service Commission
Utah Division of Public Utilities
Herbert M. Wells Building
160 East 300 South
Salt Lake City, UT 84114
ccoleman@utah.gov

Michael Ginsberg Assistant Attorney General 160 East 300 South, Fifth Floor Salt Lake City, UT 84114 mginsberg@utah.gov

Paul Proctor Assistant Attorney General 160 East 300 South, Fifth Floor Salt Lake City, UT 84114 pproctor@utah.gov

/s/Raymond Lee	
Raymond Lee	_