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Attorneys for TracFone Wireless Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Virgin Mobile USA, L.P. Petition for Limited Designation as an Eligible Telecommunications Carrier.

Docket No. 10-2521-01

PETITION TO INTERVENE OF TRACFONE WIRELESS, INC.

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, Petitioner TracFone

Wireless, Inc. ("TracFone") hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

1. Petitioner has been designated by the Utah Public Service Commission as an Eligible

Telecommunications Carrier in the State of Utah for the limited purpose of offering lifeline service

to qualified households, subject to a determination of appropriate verification procedures and fees.

2. The legal rights and interests of Petitioner may be substantially affected by this proceeding.

3. Petitioner has not fully determined the specific positions it will take or the relief it

will seek. Petitioner seeks to intervene for purposes of protecting its interests as they may appear.

4. The interests of justice and the orderly and prompt conduct of this proceeding will not

be materially impaired by allowing Petitioner to intervene.

5. Notices in this proceeding should be sent to the following:

Mitchell F. Brecher GREENBERG TRAURIG, LLP 2101 L Street, NW, Suite 1000 Washington, DC 20037 Telephone: 202-331-3100 Facsimile: 202-261-0152 Email: brecherm@gtlaw.com

Gary A. Dodge HATCH, JAMES & DODGE 10 West Broadway, Suite 400 Salt Lake City, Utah 84101 Telephone: 801-363-6363 Facsimile: 801-363-6666 Email: gdodge@hjdlaw.com WHEREFORE, Petitioner requests leave to intervene in this proceeding to protect its

interests as they may appear.

DATED this 20th day of October, 2010.

HATCH, JAMES & DODGE

/s/ _____ Gary A. Dodge Attorneys for TracFone Wireless, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 20th day of October, 2010, on the following:

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