Betsy Wolf Salt Lake Community Action Program 764 South 200 West Salt Lake City, UT 84101 Telephone: (801) 891-5040 Fax: (801) 355-1798 Email: <u>bwolf@slcap.org</u>

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of QLINK WIRELESS ) LLC for Designation as an Eligible Telecommunications ) Carrier in the State of Utah )

) Docket No. 12-2549-01

## PETITION FOR LEAVE TO INTERVENE of SALT LAKE COMMUNITY ACTION PROGRAM

Pursuant to the Rules of Practice and Procedure of the Utah Public Service Commission (Commission), Salt Lake Community Action Program hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. Salt Lake Community Action Program (SLCAP) is a private nonprofit community-based organization that addresses the needs of low-income people through the delivery of services and advocacy.

2. SLCAP has a special interest in ensuring that the people it represents are charged fair and reasonable rates for telecommunications services and have access to good quality telecommunications services which have become a necessity of contemporary life.

3. SLCAP has been involved for many years in policy issues related to the provision of telecommunications services in general and lifeline services in particular. We have been especially interested in Public Service Commission rules pertaining to lifeline services and have worked with the Commission and other parties to develop procedures to administer the program.

4. Furthermore, since Salt Lake Community Action Program represents low income people, it has a particular interest in ensuring that the telecommunications services provided specifically to low income people through a lifeline rate constitute a fair, reasonable and affordable service offering to people who may literally depend on their telecommunications as a lifeline service for health and safety matters.

4. Accordingly, SLCAP possesses a direct and substantial interest in the subject matter of this case, and seeks via this intervention petition to protect that interest as it may appear. Participation in this docket will be in the public interest and may also be of particular assistance to the Commission in rendering informed decisions on the issues that will likely be raised.

5. Intervention by SLCAP will not delay the proceeding or unduly burden the other parties in the proceeding.

6. SLCAP requests that all pleadings, correspondence, discovery, and other documents be served on:

Betsy Wolf Salt Lake Community Action Program 764 South 200 West Salt Lake City, Utah 84101 FAX: (801) 355-1798 PHONE: (801) 891-5040 E- mail: <u>bwolf@slcap.org</u>

Respectfully submitted this 28th day of September, 2012,

/s/ \_\_\_\_\_

Betsy Wolf, Utility Ratepayer Advocate Salt Lake Community Action Program

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Petition for Leave to Intervene in Docket No. 12-2549-01 of Salt Lake Community Action Program was mailed electronically this 28th day of September, 2012, to the following:

Lance J.M. Steinhart Lance J.M. Steinhart LLC Attorney for QLINK WIRELESS 1725 Windward Concourse, Suite 150 Alpharetta, Georgia 30005 Isteinhart@telecomcounsel.com

Patricia E. Schmid Justin Jetter Assistant Attorneys General Heber M. Wells Building 160 East 300 South, 5<sup>th</sup> Floor Salt Lake City, UT 84111 <u>pschmid@utah.gov</u> jjetter@utah.gov

Chris Parker Bill Duncan Casey Coleman Division of Public Utilities 160 East 300 South, 5<sup>th</sup> Floor Salt Lake City, UT 84111 <u>chrisparker@utah.gov</u> <u>wduncan@utah.gov</u> ccoleman@utah.gov Paul Proctor Assistant Attorney General Heber M. Wells Building 160 East 300 South, 5<sup>th</sup> Floor Salt Lake City, UT 84111 pproctor@utah.gov

Michele Beck Cheryl Murray Eric Orton Office of Consumer Services 160 East 300 South, 2<sup>nd</sup> Floor Salt Lake City, UT 84111 <u>mbeck@utah.gov</u> <u>cmurray@utah.gov</u> <u>eorton@utah.gov</u>

Respectfully,

/s/\_\_\_\_

BetsyWolf