

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: bwolf@slcap.org

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of.)
Total Call Wireless, Inc. for Limited Designation) Docket No. 12-2561-01
As an Eligible Telecommunications Carrier)

**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:

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PHONE: (801) 891-5040
E- mail: bwolf@slcap.org

Respectfully submitted this 17th day of January, 2013,

/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. 12-2561-01 of Salt Lake Community Action Program was mailed electronically this 17th day of January, 2013, to the following:

Robert Yap
Chief Legal/Administrative Officer
Total Call Mobile, Inc.
1411 W. 190th St., Suite 700
Gardena, CA 90248
E-Mail: roberty@totalcallusa.com

Paul Proctor
Assistant Attorney General
Heber M. Wells Building
160 East 300 South, 5th Floor
Salt Lake City, UT 84111
pproctor@utah.gov

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

Michele Beck
Cheryl Murray
Eric Orton
Office of Consumer Services
160 East 300 South, 2nd Floor
mbeck@utah.gov
cmurray@utah.gov
eorton@utah.gov

Chris Parker
Bill Duncan
Casey Coleman
Division of Public Utilities
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
chrisparker@utah.gov
wduncan@utah.gov
ccoleman@utah.gov

Kira M. Slawson
Brett N. Anderson
Stanley K Stoll
Blackburn & Stoll, LC
257 East 200 South, Suite 800
Salt Lake City, Utah 84111
kslawson@blackburn-stoll.com
bretta@blackburn-stoll.com
stans@blackburn-stoll.com

Respectfully,

/s/ Betsy Wolf