

Betsy Wolf  
Salt Lake Community Action Program  
764 South 200 West  
Salt Lake City, UT 84101  
Telephone: (801) 891-5040  
Fax: (801) 355-1789  
Email: [bwolf@slcap.org](mailto:bwolf@slcap.org)

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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

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

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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 service delivery and advocacy.
2. SLCAP has a special interest in ensuring that the people it represents are charged fair and reasonable rates for telecommunications services.
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.

5. 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.

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

7. 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: [bwolf@slcap.org](mailto:bwolf@slcap.org)

Respectfully submitted this 21st day of December, 2009,

/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. 09-2511-01 of Salt Lake Community Action Program was mailed electronically this 21st day of December, 2009, to the following:

Michael Ginsberg  
Patricia Schmid  
Assistant Attorneys General  
160 East 300 South, 5<sup>th</sup> Floor  
Salt Lake City, UT 84111  
[mginsberg@utah.gov](mailto:mginsberg@utah.gov)  
[pschmid@utah.gov](mailto:pschmid@utah.gov)

Philip Powlick  
Casey Coleman  
Division of Public Utilities  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111  
[ppowlick@utah.gov](mailto:ppowlick@utah.gov)  
[ccoleman@utah.gov](mailto:ccoleman@utah.gov)

Paul Proctor  
Assistant Attorney General  
160 East 300 South, 5<sup>th</sup> Floor  
Salt Lake City, UT 84111  
[pproctor@utah.gov](mailto:pproctor@utah.gov)

Mitchell F. Brecher  
Debra McGuire Mercer  
GREENBERG TRAUIG, LLP  
2101 L Street, N.W., Suite 1000  
Washington, D.C. 20037  
[brecherm@gtlaw.com](mailto:brecherm@gtlaw.com)  
[mercerdm@gtlaw.com](mailto:mercerdm@gtlaw.com)

Stephen F. Mechem  
Callister Nebeker & McCullough  
10 East South Temple, Suite 900  
Salt Lake City, UT 84133  
[sfmecham@cnmlaw.com](mailto:sfmecham@cnmlaw.com)

Michele Beck  
Eric Orton  
Office of Consumer Services  
160 East 300 South, 2<sup>nd</sup> Floor  
Salt Lake City, UT 84111  
[mbeck@utah.gov](mailto:mbeck@utah.gov)  
[eorton@utah.gov](mailto:eorton@utah.gov)

Respectfully,

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Betsy Wolf