

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of a General Investigation to)
Address Issues Concerning the Kansas Lifeline) Docket No. 15-GIMT-575-GIT
Service Program.)

**PETITION TO INTERVENE OF CTIA- THE WIRELESS ASSOCIATION®,
ENTRY OF APPEARANCE,
AND ACCEPTANCE OF ELECTRONIC SERVICE**

COMES NOW CTIA – The Wireless Association® (“CTIA”) and moves the State Corporation Commission of the State of Kansas (“Commission”) for an order permitting it to intervene in the above-captioned matter pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support thereof, CTIA states as follows:

1. CTIA-The Wireless Association® (“CTIA”) represents the U.S. wireless communications industry. With members from wireless carriers and their suppliers to providers and manufacturers of wireless data services and products, the association brings together a dynamic group of companies that enable consumers to lead a 21st century connected life. CTIA members benefit from its vigorous advocacy at all levels of government for policies that foster the continued innovation, investment and economic impact of America’s competitive and world-leading mobile ecosystem. The association also coordinates the industry’s voluntary best practices and initiatives and convenes the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.¹

2. On July 12, 2016, the Kansas Corporation Commission (“Commission” or “KCC”) issued an *Order Opening Docket; Soliciting Comments; Procedural Matters and Schedule* (Order), soliciting comments from the telecommunications industry regarding what

¹ A list of CTIA’s members can be found at <http://www.ctia.org/about-us/current-members>.

changes, if any, the Commission should make to the Kansas lifeline services program (“KLSP”) as a result of the federal Lifeline changes.

3. The issues being investigated in this docket would have a significant impact on CTIA and its members. CTIA would like the opportunity to provide comments on behalf of its membership, including those members not able to take an active role individually in this proceeding but who may be affected by the Order. No existing party to this docket has the ability to represent the full spectrum of interests of CTIA’s membership. CTIA is able to represent this interest in a focused and concise manner. Additionally, CTIA accepts the status and existing schedule of the docket and is not requesting any modifications or concessions in that regard.

4. K.A.R. 82-1-225 and K.S.A. 77-521 provide that a petition for intervention shall be granted if three conditions are met: (1) the petition is submitted in writing and provided to parties at least three days before hearing; (2) the petition states facts demonstrating that the petitioner’s legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervener under any provision of law; and (3) the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. CTIA has met this standard for mandatory intervention.

5. Alternatively, CTIA meets the standard for discretionary intervention. K.A.R. 82-1-225 and K.S.A. 77-521 permit the presiding officer to grant a petition for intervention at any time upon determining that the intervention sought is in the interest of justice and will not impair the orderly and prompt conduct of the proceedings. Allowing CTIA to intervene is in the interests of justice as it will assist the Commission in obtaining comments from all interested parties and it will not impede the progress of the docket or impact its present status.

6. In addition to undersigned counsel, all notices, pleadings, orders or other documents should be served on the following:

Benjamin Aron
Director, State Regulatory and External Affairs
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7. CTIA hereby consents to electronic service in this docket.

Respectfully submitted,

/s/ Glenda Cafer

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COUNSEL FOR CTIA

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 19th day of July, 2016 to:

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