

**IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**PETITION TO ELIMINATE STATE
LIFELINE CREDIT**

DOCKET NO. 12-00035

PETITION TO INTERVENE

Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority ("TRA" or "Authority") to grant the Consumer Advocate's intervention into this proceeding on behalf of the public interest, because Tennessee households eligible for the state Lifeline program may be adversely affected by petition of BellSouth Telecommunications LLC d/b/a AT&T Tennessee, the CenturyLink Companies, Frontier Communications Co of Tennessee/Volunteer and Frontier Communications of America, TDS Telecom, Tennessee Telephone Association, Level 3 Communications, LLC and tw telecom of tennessee, llc ("jointly, the "Industry Coalition") to eliminate the state Lifeline credit. For cause, Petitioner would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utility services by initiating and intervening as a party in proceedings before the Authority in accordance with the Uniform Administrative Procedures Act and Authority rules.

2. On May 1, 2012, the Industry Coalition filed a petition requesting the Authority to eliminate the state Lifeline credit. The state Lifeline credit helps support basic wireline telephone for eligible low income Tennessee households.

3. The state Lifeline program provides a monthly \$3.50 credit to approximately 93,687 eligible low-income Tennessee households.¹ The relief sought by the Industry Coalition will remove the monthly credit and affect thousands of Tennessee households.

4. The enrollment of Tennesseans in the state and federal Lifeline has surged from 64,039 households in 2007 to 406,500 by 2011 during a period of severe economic challenges and a struggling job market.² Based on estimates of the Department of Human Services, there are a total of 625,162 households eligible for Lifeline in Tennessee.³

5. Lifeline is an important state and federal program intended to insure access to both mobile and wire-line networks for all Americans. The Federal Communications Commission ("FCC") has recently made reforms to the federal Lifeline program in an effort to eliminate waste and fraud while discontinuing the Linkup program, but continues to support the goals at the heart of Lifeline.

6. Eliminating the state Lifeline credit at this time may not serve the public interest. Only by participating in this proceeding can the Consumer Advocate work adequately to protect the interests of consumers.

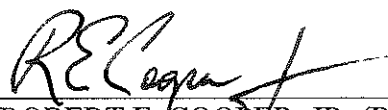
WHEREFORE, Petitioner respectfully asks the Authority to grant the Petition to Intervene.

¹ TRA Annual Report 2010-2011, p. 12.

² *Id.*, p. 16.

³ Tennessee Lifeline Workshop, March 19, 2012, TRA presentation.

RESPECTFULLY SUBMITTED,



ROBERT E. COOPER, JR. (BPR #010934)
Attorney General and Reporter
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Dated: MAY 18, 2012.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail or electronic mail upon:

This the 18th day of MAY, 2012.

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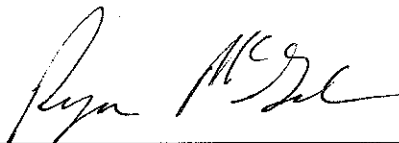
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