

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

FULL SERVICE NETWORK; TRUCONNECT
MOBILE; SAGE TELECOMMUNICATIONS, LLC;
and TELESCAPE COMMUNICATIONS, INC.,

Petitioners,

v.

FEDERAL COMMUNICATIONS COMMISSION
and UNITED STATES OF AMERICA,

Respondents.

No. 15-1151

**MOTION OF CTIA – THE WIRELESS ASSOCIATION[®]
FOR LEAVE TO INTERVENE**

Pursuant to 47 U.S.C. § 402(e), 28 U.S.C. § 2348, Rule 15(d) of the Federal Rules of Appellate Procedure, and D.C. Circuit Rule 15(b), CTIA – The Wireless Association[®] (“CTIA”) hereby moves for leave to intervene as of right in support of Respondents solely in the above-captioned proceeding, and not in any existing proceedings with which this petition is consolidated.

Petitioners seek review of the FCC’s Report and Order on Remand, Declaratory Ruling, and Order, *Protecting and Promoting the Open Internet*, GN Docket No. 14-28, FCC 15-24 (rel. Mar. 12, 2015) (“*Order*”). Unlike all of the other petitioners that have filed petitions to date, these Petitioners intend to argue that the FCC should have imposed even more regulation on providers of broadband Internet access service, including CTIA’s member companies. CTIA actively

participated in the agency proceedings below, and its interests will be substantially affected by this Court's review of the *Order*. CTIA is therefore entitled to intervene as a matter of right under 28 U.S.C. § 2348.

Wherefore, CTIA respectfully requests that it be granted leave to intervene in support of Respondents.

Respectfully submitted,

/s/ Helgi C. Walker

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May 26, 2015

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CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and this Court's Rule 26.1, CTIA – The Wireless Association[®] (“CTIA”) respectfully submits the following corporate disclosure statement.

CTIA (formerly known as the Cellular Telecommunications & Internet Association) is a Section 501(c)(6) not-for-profit corporation organized under the laws of the District of Columbia and represents the wireless communications industry. Members of CTIA include service providers, manufacturers, wireless data and Internet companies, and other industry participants. CTIA has not issued any shares or debt securities to the public, and CTIA has no parent companies, subsidiaries, or affiliates that have issued any shares or debt securities to the public.

Respectfully submitted,

/s/ Helgi C. Walker

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CERTIFICATE OF SERVICE

I hereby certify that, on May 26, 2015, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit using the appellate CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

/s/ Helgi C. Walker
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