

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

FULL SERVICE NETWORK, *et al.*,

*Petitioners,*

v.

FEDERAL COMMUNICATIONS COMMISSION  
and UNITED STATES OF AMERICA,

*Respondents.*

No. 15-1151 (consolidated  
with Nos. 15-1063 *et al.*)

**MOTION OF THE WIRELESS INTERNET SERVICE PROVIDERS  
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), the Wireless Internet Service Providers Association (“WISPA”) 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 petitioned for review of the *Order* to date, these Petitioners intend to argue that the FCC should have imposed even more regulation on providers of broadband Internet access service, including members of WISPA, the vast majority of which are small businesses. WISPA and many of its members

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

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

Respectfully submitted,

/s/ Stephen E. Coran

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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, the Wireless Internet Service Providers Association ("WISPA") respectfully submits the following corporate disclosure statement.

WISPA is a non-profit association that represents the interests of providers of fixed wireless broadband Internet access services. The Wireless Internet Service Providers Association has no parent corporation and no publicly held corporation owns ten percent (10%) or more of its stock, pays ten percent (10%) or more of its dues, or possesses or exercises ten percent (10%) of the voting control of WISPA. There is no publicly held member of WISPA whose stock or equity value could be affected substantially by the outcome of the proceeding or whose claims WISPA is pursuing in a representative capacity.

/s/ Stephen E. Coran

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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/ Stephen E. Coran*

Stephen E. Coran