



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED

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Order Instituting Investigation on the Commission's
Own Motion Into the Planned Purchase and Acquisition
by AT&T Inc. of T-Mobile USA, Inc., and its Effect on
California Ratepayers and the California Economy.

I.11-06-009

**MOTION OF THE UTILITY REFORM NETWORK (TURN)
REQUESTING PARTY STATUS**



June 15, 2011

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**MOTION OF THE UTILITY REFORM NETWORK (TURN)
REQUESTING PARTY STATUS**

Pursuant to Rule 1.4 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, The Utility Reform Network (TURN) hereby respectfully moves for party status in this proceeding.

I. TURN's Interest in this Proceeding

TURN seeks party status in this proceeding in order to advance and protect the interests of the residential customers that it has represented in Commission proceedings for over 30 years. In that capacity, TURN has participated in the majority of merger proceedings that have come before the Commission. TURN's primary interest in this merger proceeding is to ensure that the proposed merger between AT&T and T-Mobile will be in the best interests of consumers. The merger, if approved, clearly will result in one less national wireless carrier, a carrier that has offered wireless services at a significantly lower price than any of the other three national carriers. T-Mobile has been an attractive alternative for low-income consumers. TURN is deeply concerned that the proposed merger will not only eliminate such an offering from the marketplace but will fundamentally change the competitive dynamics so that the market will be dominated by the two largest carriers – AT&T and Verizon Wireless. TURN intends to address most if not all the issues identified in the Order Instituting Investigation (OII) with particular emphasis on the effect of the proposed merger on consumers, competition and competitors. These issues include the impact of the proposed merger on service quality, pricing and availability of wireless options for consumers. TURN will also identify

conditions that may be appropriate for the Commission and/or the FCC to order to mitigate, if necessary, any negative effects of the merger.

II. Notice

Service of notices, orders and other correspondence in this proceeding should be directed to the following TURN employees:

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For the foregoing reasons, TURN respectfully requests to be granted party status in this proceeding.

Dated: June 15, 2011

Respectfully submitted,

_____/S/_____
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