

**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 UNITED STATES TELECOM ASSOCIATION
FOR LEAVE TO INTERVENE**

Pursuant to 47 U.S.C. § 402(e), 28 U.S.C. § 2348, and Rule 15(d) of the Federal Rules of Appellate Procedure, the United States Telecom Association (“USTelecom”) 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 USTelecom’s member companies. USTelecom actively participated in the agency proceedings below, and its interests will be

substantially affected by this Court's review of the *Order*. USTelecom is therefore entitled to intervene as a matter of right under 28 U.S.C. § 2348.

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

Respectfully submitted,

/s/ Michael K. Kellogg

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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 United States Telecom Association ("USTelecom") respectfully submits the following corporate disclosure statement.

USTelecom states that it has no parent corporation and that no publicly held corporation owns 10% or more of its stock.

Respectfully submitted,

/s/ Michael K. Kellogg

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May 26, 2015

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/ Michael K. Kellogg
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