

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: VERIZON RHODE ISLAND : Docket No. 3692
 ALTERNATE FORM OF :
 REGULATION PLAN :

**MOTION OF THE GEORGE WILEY CENTER TO
INTERVENE AS A FULL PARTY**

The George Wiley Center, by its attorney, moves under Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission to intervene as a full party in this action on the following grounds:

1. The George Wiley Center is a state-wide non-profit organization with headquarters in Pawtucket, Rhode Island.
2. The George Wiley Center's mission is to conduct community organizing and advocacy on behalf of all low-income Rhode Islanders.
3. The George Wiley Center has a long history of advocacy on behalf of low-income Rhode Islanders before the Public Utilities Commission.
4. The interests of the George Wiley Center are such that intervention is necessary and appropriate under PUC Rule 1.13(b). In particular, under PUC Rule 1.13(b)(2) and (3), the George Wiley Center's low-income constituents may be directly affected by Verizon's proposal concerning low-income Lifeline customers.
5. The George Wiley Center takes the position that the requested plan should be rejected.

WHEREFORE, the George Wiley Center asks that its motion to intervene be granted.

Respectfully submitted,
The George Wiley Center
By its attorney,

B. Jean Rosiello #2886
340 Olney Street
Providence, RI 02906
Tel.: 401-751-5090
Fax: 401-751-5096
Email: jeanrosiello@cox.net

CERTIFICATE OF SERVICE

I certify that on the 1st day of December, 2005, I caused a copy of this document to be e-mailed to each of the following:

Theresa.obrien@verizon.com
Alexander.w.moore@verizon.com
Lwold@riag.state.ri.us
sscialabba@ripuc.state.ri.us
bkent@ripuc.state.ri.us
jlanni@ripuc.state.ri.us
mbotelho@riag.state.ri.us
wluoker@riag.state.ri.us
Tweiss1@nc.rr.com
jose.jimenez@cox.com
robert.howley@cox.com
wayne.lafferty@comcast.net
Ceaton@apslaw.com
Ashoer@conversent.com
