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David L. Rice david.rice@millernash.com

May 19, 2004

## **HAND-DELIVERED**

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
Post Office Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, Washington 98504-7250

Subject: Docket No. UT-040788

Dear Ms. Washburn:

Attached for filing is an original and 12 copies of the Petition to Intervene on behalf of the Northwest Public Communications Council, in the above-referenced docket.

Very truly yours,

David L. Rice

cc w/enc: All Parties of Record

## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Docket No. UT-040788

Complainant

v.

PETITION OF THE NORTHWEST PUBLIC COMMUNICATIONS COUNCIL TO INTERVENE

VERIZON NORTHWEST INC.,

Respondent.

- 1 The Northwest Public Communications Council ("NPCC") petitions for intervention in this docket. In support of its petition, NPCC states the following:
- 2 This petition is brought under WAC 480-07-355.
- NPCC will not, by its appearance and participation herein, broaden the issues in this docket.
- 4 NPCC's address is:

Northwest Public Communications Council Attn: Randy Linderman 1315 N.W. 185<sup>th</sup> Ave., Suite 215 Beaverton, OR 97006-1947 5 The name and address of NPCC's attorneys are:

Brooks E. Harlow David L. Rice Miller Nash LLP 4400 Two Union Square 601 Union Street Seattle, WA 98101-2352 Phone: (206) 622-8484

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NPCC's interest in this proceeding is as follows. NPCC is a trade association comprised of competitive payphone providers doing business in the states of Washington, Oregon, Idaho, and Montana. NPCC has intervened and participated in several dockets before this Commission regarding payphone issues. Members of NPCC presently purchase public access lines and other services from Verizon. This docket may affect Verizon's rates for these services. NPCC wishes to participate in the process by which those rates are set. NPCC will develop its position over the course of this docket.

WHEREFORE, NPCC requests leave to intervene as a party to this proceeding. DATED this 19<sup>th</sup> day of May, 2004.

MILLER NASH LLP

Brooks E. Harlow WSB No. 11843 David L. Rice WSB No. 29180

Attorneys for Intervenor Northwest Public Communications Council

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## CERTIFICATE OF SERVICE UT-040788

I hereby certify that I have this day served a true and correct copy of the Petition To Intervene on behalf of the Northwest Public Communications Council by placing in a self-addressed, stamped envelope to the following:

Donald Trotter Chris Swanson Assistant Attorney General 1400 S. Evergreen Park Drive S.W. Post Office Box 40128 Olympia, WA 98504-0128

Judith A. Endejan Graham & Dunn PC Pier 70 2801 Alaskan Way, Suite 300 Seattle, WA 98121-1128

Simon J. ffitch Public Counsel Section Office of Attorney General 900 Fourth Avenue, Suite 2000 Seattle, WA 98164-1012

Dated at Seattle, Washington this 19th day of May, 2004.

Carol Munnerlyn

Secretary