

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	DOCKET UT-073033
	)	
QWEST CORPORATION,	)	COVAD PETITION TO INTERVENE
	)	
For Commission Approval of 2007	)	
Additions to Non-Impaired Wire Center	)	
List	)	
	)	
.....	)	
	)	
In the Matter of the Petition of	)	DOCKET UT-073035
	)	
QWEST CORPORATION,	)	
	)	
For Investigation Concerning the Status	)	
of Competition and Impact of the	)	
FCC’s Triennial Review Remand Order	)	
on the Competitive	)	
Telecommunications Environment in	)	
Washington State	)	
.....	)	

Pursuant to WAC 480-07-355, Covad Communications Company (“Covad”) hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, Covad states as follows:

I.

1. The names, addresses, and telephone numbers of the persons to whom communications should be addressed are:

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## II.

2. Covad is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. Covad currently competes with, and obtains services and facilities from, Qwest Corporation (“Qwest”) in the provision of intraexchange and interexchange services.

## III.

3. Covad has a substantial interest in the subject matter of this proceeding. Qwest has requested that the Commission approve additions to Qwest’s non-impaired wire center list. Qwest’s petition could impact the rates that Qwest offers its wholesale customers such as Covad if wire centers were added to the non-impaired list and certain unbundled network elements thus became unavailable at cost-based rates in those wire centers. The related increase in the rates Covad is charged for wholesale services that it purchases from Qwest could impact Covad’s ability to provide the products and services it offers to customers in those wire center areas. Covad, therefore, is materially interested in, and will be substantially affected by, the Commission’s resolution of the issues presented in this proceeding.

IV.

4. The evidence, if any, and briefing presented by Covad will be of material value to the Commission in its determination of the issues involved in this proceeding, and Covad's intervention will not broaden those issues or delay the proceedings.

5. WHEREFORE, Covad prays for leave to intervene as a party to this proceeding, with a right to discovery, to have notice of and appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on brief and at oral argument.

DATED this \_\_\_\_ day of July, 2006.

DAVIS WRIGHT TREMAINE LLP  
Attorneys for Covad Communications  
Company

By \_\_\_\_\_  
Gregory J. Kopta  
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