

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of)
) DOCKET NO. UT-100820
QWEST COMMUNICATIONS)
INTERNATIONAL INC. AND) PAC-WEST PETITION TO
CENTURYTEL, INC.) INTERVENE
)
For Approval of Indirect Transfer of Control of)
Qwest Corporation, Qwest Communications
Company LLC, and Qwest LD Corp.

1. Pursuant to WAC 480-07-355, Pac-West Telecomm, Inc. ("Pac-West") hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, Pac-West states as follows:

I.

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

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II.

3. Pac-West is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. Pac-West currently competes with, and obtains interconnection and related services and facilities from, Qwest Corporation ("Qwest") in the provision of Pac-West's telecommunications services.

III.

4. Pac-West has a substantial interest in the proposed transfer of control of Qwest to CenturyTel. Qwest is the largest incumbent local exchange carrier (“ILEC”) in Washington. Pac-West relies on interconnection with, and related services and facilities obtained from, Qwest to offer and provide service to customers in Qwest’s service territory. Pac-West seeks to participate in this proceeding to ensure that the proposed transaction will not adversely impact competition in Washington or Pac-West’s rights and ability to obtain the interconnection and related services and facilities it needs to provide its telecommunications services.

IV.

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

WHEREFORE, Pac-West 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.

RESPECTFULLY SUBMITTED this 26th day of May 2010.

DAVIS WRIGHT TREMAINE LLP



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Attorneys for Pac-West Telecomm, Inc.