

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Pricing Proceeding)	
for Interconnection, Unbundled Elements)	DOCKET NO. UT-960369
Transport and Termination, and Resale)	
_____)	
)	
In the Matter of the Pricing Proceeding)	
for Interconnection, Unbundled Elements)	DOCKET NO. UT-960370
Transport and Termination, and Resale)	
for U S WEST COMMUNICATIONS, INC.)	
_____)	
)	
In the Matter of the Pricing Proceeding)	DOCKET NO. UT-960371
for Interconnection, Unbundled Elements)	
Transport and Termination, and Resale)	PETITION OF ADVANCED TELCOM
for GTE NORTHWEST INCORPORATED)	GROUP, INC., TO INTERVENE
_____)	

Advanced TelCom Group, Inc. ("ATG"), pursuant to WAC 480-09-430(1), hereby requests leave to intervene in the above-entitled dockets. In support of its request, ATG states as follows:

I.

All communications with ATG should be directed to the following persons:

Gregory J. Kopta	Kath Thomas
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II.

ATG is a facilities-based telecommunications company that was authorized by the Commission to provide intraexchange and interexchange telecommunications services throughout the State of Washington in Docket No. UT-981279. ATG currently competes with U S WEST Communications, Inc. ("USWC") in the provision of local exchange services and intends to compete with GTE Northwest Incorporated ("GTE") in the provision of local exchange services in the near future. ATG, pursuant to the federal Telecommunications Act of 1996 ("Act"), entered into an interconnection agreement with USWC, which the Commission approved on December 9, 1998, in Docket No. UT-980390. ATG also recently merged with Shared Communications Services, Inc. ("SCS"), a party to this proceeding.

III.

Having merged with SCS, an existing party, ATG should already be considered a party to this proceeding. To the extent that ATG must nevertheless petition for intervention, ATG has a substantial interest in the remaining issues to be resolved in this proceeding and has not had an opportunity to seek to intervene prior to this time.

ATG was not registered to provide telecommunications service in Washington until October 28, 1998, and did not enter into an interconnection agreement with USWC until December 9, 1998 -- long after Phase I of this proceeding concluded and near the conclusion of hearings in Phase II. The Seventeenth Supplemental Order established Phase III, providing ATG with its first opportunity to seek to participate in this proceeding. The resolution of issues to be addressed in Phase III -- including collocation prices, assignment of loop conditioning costs, and

geographic deaveraging of the rates for network elements and interconnection -- will have a direct, material, and particular impact on ATG. ATG intends to serve smaller communities that other CLECs serve or have an announced intention to serve, and appropriate geographic deaveraging and collocation pricing are vital to ATG's ability to provide service in such areas. ATG thus has a substantial interest in the resolution of these issues that is not represented by any current party.

IV.

As a CLEC with a direct and particular interest in the outcome of these proceedings, ATG's participation will be of material value to the Commission. ATG's intervention will not broaden the issues to be addressed or delay the proceedings, and ATG will coordinate with existing parties to minimize any duplication or overlap in presentation of positions.

WHEREFORE, ATG respectfully requests 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 _____ day of September, 1999.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Advanced TelCom Group, Inc.

By _____
Gregory J. Kopta
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