

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Pricing Proceeding) for Interconnection, Unbundled Elements) Transport and Termination, and Resale) _____)	Docket No. UT-960369
In the Matter of Pricing Proceeding) Interconnection, Unbundled Elements,) Transport and Termination, and Resale for) _____)	Docket No. UT-960370
US WEST COMMUNICATIONS, INC.) _____)	
In the Matter of the Pricing Proceeding) for Interconnection, Unbundled Elements,) Transport and Termination, and Resale for) _____)	Docket No. UT-960371
GTE NORTHWEST INCORPORATED) _____)	PETITION OF RHYTHMS LINKS, INC. TO INTERVENE

Rhythms Links, Inc. (“Rhythms”), formerly ACI Corp.,¹ pursuant to WAC 480-09-430(1), hereby requests leave to intervene in the above titled dockets for Phase III. In support of its request, Rhythms states as follows:

I. CONTACT INFORMATION

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

Angela Wu
ATER WYNNE LLP
2 Union Sq., #5450
601 Union Street
Seattle, WA 98101
voice: 206.628.4711
fax: 206.467.8406
email: awu@aterwynne.com

Jo Gentry
Rhythms Links, Inc.
7337 South Revere Parkway
Englewood, Colorado 80112
main voice: 303.476.4200
fax: 303.476.4201
email: jgentry@rhythms.net

¹ See Letter from D.Rice, Miller Nash to C.Washburn, Executive Secretary, WUTC re notification of name change (August 5, 1999).

II. BACKGROUND INFORMATION

Rhythms Links, Inc. is a Delaware corporation, with its principal place of business at 7337 South Revere Parkway, Englewood, Colorado 80112. Rhythms was authorized to do business in the State of Washington in Docket No. UT-47-980790 on July 22, 1998 as ACI Corp. A notice of a name change from ACI Corp. to Rhythms Links, Inc. was submitted to Carole Washburn, Executive Secretary, Washington Utilities and Transportation Commission, on August 5, 1999.

As a provider of facilities-based competitive local exchange and intrastate interexchange services of high-speed data services on a facilities and resale basis, and voice services on a resale basis in the State of Washington, Rhythms will have a direct and immediate interest in the subject matters in this docket. Rhythms provides services that are in competition with US West Communications, Inc. (USWC) and GTE Northwest Incorporated (GTE).

III. INTEREST IN PROCEEDING

Rhythms was not registered to provide telecommunications service in Washington until July 22, 1998, and did not enter into interconnection agreements with USWC and GTE until long after Phase I of this proceeding concluded, and near the conclusion of Phase II. The Seventeenth Supplemental Order established Phase III, provides Rhythms with its first opportunity to participate in this proceeding. The issues to be addressed in Phase III: collocation prices, assignment of loop conditioning costs, and geographic deaveraging of the rates for network elements and interconnection – will have a direct and material impact on Rhythms ability to provide its DSL services competitively to consumers in Washington state.

IV. SCOPE OF PARTICIPATION

As a national service provider of high-speed local access networking solutions using DSL technology, Rhythms will provide business insights and practical experience on the issues referenced above. Rhythm's intervention will not broaden the issues to be addressed or delay the proceedings. Indeed, the Commission and the public will benefit by Rhythm's participation as a competitive local exchange carrier (CLEC) in this proceeding.

Rhythms respectfully requests leave to intervene as a party to this proceeding, with a right of 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 17th day of September, 1999 by:

ATER WYNNE LLP
Attorneys for Rhythms Links, Inc.

By: _____
Angela Wu
WSBA No. 28112

cc: Jo Gentry
Frank Paganelli
Jim Schelterman
Lisa Anderson
Attached Service List

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Re: **Petition to Intervene for Rhythms Links, Inc.**
In the Matter of the Pricing Proceeding for Interconnection, Unbundled
Elements, Transport and Termination, and Resale (Docket Nos. UT-960369,
UT-960370, UT-960371)

Dear Ms. Washburn:

Enclosed please find an original and ____ copies of Rhythms Links, Inc. (Rhythms) Petition to Intervene in the above referenced matter. Copies of Rhythms's Petition have been served to the parties listed on the enclosed service list.

If you have any questions, please feel free to call me at 206.623.4711 (x8238). Thank you for your assistance with this matter.

Sincerely,

Angela Wu

cc: Frank Paganelli
Jo Gentry
Jim Scheltema
Lisa Anderson