

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 NEW EDGE
for GTE NORTHWEST INCORPORATED)	NETWORKS, INC., TO INTERVENE
_____)	

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

I.

All communications with New Edge should be directed to the following persons:

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II.

New Edge is a facilities-based telecommunications company that was authorized by the Commission to provide intraexchange and interexchange telecommunications services throughout the State of Washington on July 28, 1999, in Docket No. UT-990945. New Edge intends to offer local exchange service -- primarily digital subscriber line ("DSL") and related data services in competition with U S WEST Communications, Inc. ("USWC") and GTE Northwest Incorporated ("GTE"). New Edge, pursuant to the federal Telecommunications Act of 1996 ("Act"), entered into an interconnection agreement with USWC (which the Commission is scheduled to approve on September 22, 1999, in Docket No. UT-990386), and is negotiating an interconnection agreement with GTE.

III.

The prices New Edge must pay to incumbent local exchange carriers ("ILECs") for access to, and interconnection with, the ILECs' network are of critical importance to New Edge's ability to provide an effective alternative to services provided by USWC and GTE. In particular, appropriate recurring and nonrecurring rates for cageless physical collocation and geographically deaveraged unbundled loops must be cost-based and set in accordance with the Act, FCC rules, and appropriate economic principles. New Edge was not registered to provide telecommunications service in Washington until July 1999, and is only now entering into interconnection agreements with USWC and GTE, long after the first two phases of this proceeding concluded. The Seventeenth Supplemental Order established Phase III, providing New Edge 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 New Edge. New Edge is also uniquely impacted by these issues because it intends to offer service in areas that currently are not served by existing providers.

IV.

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

WHEREFORE, New Edge 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 New Edge Networks, Inc.

By _____
Gregory J. Kopta
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