

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)	ADVANCED TELCOM GROUP, INC.,
for GTE NORTHWEST INCORPORATED)	OBJECTION TO 19TH SUPPLEMENTAL
_____)	ORDER

Advanced TelCom Group, Inc. ("ATG"), pursuant to WAC 480-09-460(2), hereby objects to the provision of the Nineteenth Supplemental Order/Prehearing Conference Order denying ATG's Petition to Intervene in Phase III of this proceeding.

The Commission denied ATG's Petition because the Commission concluded that ATG's intervention would be "unnecessary and potentially wasteful" in light of the recent merger with Shared Communications Services, Inc. ("SCS"), which is already a party to this proceeding. Nineteenth Supp. Order at 3. ATG and SCS remain separate operating entities in Washington following the merger, but ATG is also responsible for regulatory issues that impact the merged company as a whole in this state. MFS, MCI/MCImetro, and WorldCom (with the potential

addition of Sprint), as well as AT&T and TCG, have merged but remain separate parties in this proceeding. ATG, like these other parties, seeks to participate in this proceeding to directly represent its own, as well as the merged company's, interests.

Accordingly, the Commission should permit ATG to intervene and participate in this proceeding to the same extent other merged entities have been permitted to participate.

Alternatively, ATG and SCS jointly request that the Commission substitute ATG for SCS as the party of record for the merged company in this proceeding, including amending the service list to replace those persons entitled to notice and service on behalf of SCS with the following persons representing ATG:

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RESPECTFULLY SUBMITTED this 12th day of November, 1999.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Advanced TelCom Group, Inc., and
Shared Communications Services, Inc.

By _____
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