

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of)
Verizon Communications Inc. and Frontier) DOCKET NO. UT-090842
Communications Corporation for an Order)
Declining to Assert Jurisdiction Over, or, in the) COMCAST PETITION TO INTERVENE
Alternative, Approving the Indirect Transfer of)
Control of Verizon Northwest Inc.)

1. Pursuant to WAC 480-07-355, Comcast Phone of Washington, LLC (“Comcast”) hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, Comcast 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. Comcast is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. Comcast currently competes with, and obtains interconnection and related services and facilities from, Verizon Northwest Inc. (“Verizon”) in the provision of Comcast’s telecommunications services.

III.

4. Comcast has a substantial interest in the proposed transfer of control of Verizon to Frontier Communications Corporation (“Frontier”). Verizon is the second largest incumbent local exchange carrier (“ILEC”) in Washington, and interconnection with Verizon is vital to Comcast’s ability to provide service to customers in Verizon’s service territory. Frontier, in contrast, has no operations or track record as an ILEC in this state. Comcast, therefore, seeks to ensure that the proposed transaction will not adversely impact competition or Comcast’s right or 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 Comcast will be of material value to the Commission in its determination of the issues involved in this proceeding, and Comcast’s intervention will not broaden those issues or delay the proceedings.

WHEREFORE, Comcast 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 10th day of June 2009.

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