

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	
)	Docket No. UT-040788
Complainant,)	
)	AT&T PETITION TO
v.)	INTERVENE
)	
VERIZON NORTHWEST INC.,)	
)	
Respondent.)	
_____)	

Pursuant to WAC 480-07-355, AT&T Communications of the Pacific Northwest, Inc. (“AT&T”) hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, AT&T states as follows:

I.

The names, addresses, and telephone numbers of the persons to whom communications should be addressed are:

Gregory J. Kopta
DAVIS WRIGHT TREMAINE LLP
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688
Voice: (206) 628-7692
Fax: (206) 628-7699
E-mail: gregkopta@dwt.com

Mary B. Tribby
Letty S. D. Friesen
AT&T
1875 Lawrence St., Room 1575
Denver, Colorado 80202
Voice: (303) 298-6475
Fax: (303) 298-6501
E-mail: lsfriesen@att.com

II.

AT&T is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington.

AT&T currently competes with, and obtains services and facilities from, Verizon Northwest Inc. (“Verizon”) in the provision of toll and other intraexchange and interexchange services.

III.

AT&T has a substantial interest in the rates that Verizon charges for intrastate tariffed services and facilities that Verizon provides to AT&T and other competing toll and local service providers. AT&T, for example, is one of the largest purchasers of Verizon’s intrastate switched access services. Verizon has yet to identify the rates that it will propose for these or other intrastate tariffed services that Verizon provides to competing companies, but the level of those rates will directly impact AT&T’s ability to provide effectively competitive intrastate toll and other services in Washington. AT&T also has an interest in the rates that Verizon charges for services provided to its end-user customers to the extent that those services include facilities or services that AT&T and other competitors must obtain from Verizon, to ensure that AT&T has a full and fair opportunity to compete. AT&T, therefore, has a direct and substantial interest in the rates that the Commission establishes for Verizon’s intrastate tariffed services in this proceeding.

IV.

The evidence to be presented by AT&T will be of material value to the Commission in its determination of the issues involved in this proceeding, and AT&T’s intervention will not broaden those issues or delay the proceedings.

WHEREFORE, AT&T 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 _____ day of May, 2004.

DAVIS WRIGHT TREMAINE LLP
Attorneys for AT&T Communications of the Pacific
Northwest, Inc.

By _____
Gregory J. Kopta
WSBA No. 20519

Mary B. Tribby
Letty S. D. Friesen
AT&T
1875 Lawrence Street, Room 1575
Denver, CO 80202