

**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)	PETITION OF 360NETWORKS TO
Alternative, Approving the Indirect Transfer of)	INTERVENE
Control of Verizon Northwest Inc.)	
)	

Pursuant to WAC 480-07-355, 360networks (USA) inc. ("360networks") hereby petitions to intervene in the above-captioned docket. In support of its petition, 360networks states the following:

1. The name and address of the Petitioner is:

360networks (USA) inc.
867 Coal Creek Circle, Suite 160
Louisville, CO 80027

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

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3. 360networks is a wholesale supplier of communications services and a registered competitive local exchange carrier in the State of Washington. 360networks currently has an interconnection agreement with Verizon Northwest, Inc. ("Verizon") in

Washington and is a wholesale customer of Verizon's products, both through its interconnection agreements and through tariffs.

4. 360networks 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 in Washington. 360networks relies on interconnection with, and related services and facilities obtained from, Verizon to offer and provide service to 360networks's customers in Verizon's service territory. 360networks seeks to participate in this proceeding to ensure that the proposed transaction will not adversely impact competition in Washington or 360networks's rights and ability to obtain the interconnection and related services and facilities it needs to provide its telecommunications services.
5. The evidence, if any, and briefing presented by 360networks will be of material value to the Commission in its determination of the issues involved in this proceeding, and 360networks's intervention will not broaden those issues or delay the proceedings.

WHEREFORE, 360networks 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 6th day of July 2009.

MCDOWELL & RACKNER, PC



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