

RECEIVED
97 JUL -3 PM 4:20
OFFICE OF THE CLERK
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation on)
the Commission's Own Motion Whether)
the IntraLATA Toll Service of) Docket No. UT-970767
)
GTE NORTHWEST INCORPORATED) AT&T'S PETITION TO
) INTERVENE
Should Be Classified as a)
Competitive Service.)
_____)

Pursuant to WAC 480-09-430(1), 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	Maria Arias-Chapleau
DAVIS WRIGHT TREMAINE LLP	Susan D. Proctor
2600 Century Square	AT&T Communications of the
1501 Fourth Avenue	Pacific Northwest, Inc.
Seattle, WA 98101-1688	1875 Lawrence St., Room 1575
(206) 622-3150	Denver, Colorado 80202
	(303) 298-6164

Ron Gayman
AT&T Communications of the
Pacific Northwest, Inc.
2601 Fourth Avenue, 6th Floor
Seattle, WA 98121

ORIGINAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

II.

AT&T is a telecommunications company authorized to provide intraexchange and interexchange telecommunications services throughout Washington. AT&T currently competes with GTE Northwest Incorporated ("GTE") in the provision of toll and other interexchange services and soon will begin to compete with GTE in the local exchange market. AT&T is negotiating and arbitrating contracts with GTE to establish the rates, terms and conditions for interconnection, unbundled network elements, transport and termination, and resale pursuant to the Telecommunications Act of 1996. See Docket No. UT-960306.

III.

AT&T has a substantial interest in whether GTE's intraLATA toll service is classified as a competitive service. AT&T not only competes with GTE in the provision of that service but AT&T must obtain switched access from GTE as an incumbent local exchange carrier. GTE thus is positioned to leverage its monopoly power in the intraexchange market into the more competitive interexchange market in Washington. AT&T does not oppose the idea of competitive classification of intraLATA toll as provided by GTE, nor does AT&T object to conducting this proceeding as a formal investigation and fact finding. AT&T and other competing providers of intraLATA toll services, however, would suffer substantial harm if the Commission does not establish sufficient safeguards to ensure that competitive classification does not become a license for GTE to engage in anticompetitive practices.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

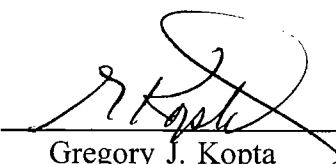
IV.

The comments and any 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 3RD day of July, 1997.

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

By 

Gregory J. Kopta
WSBA No. 20519

Maria Arias-Chapleau
Susan D. Proctor
AT&T Communications of the
Pacific Northwest, Inc.
1875 Lawrence Street, Room 1575
Denver, CO 80202

RECEIVED

97 JUL -3 PM 1:20

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation on)	
the Commission's Own Motion Whether)	
the IntraLATA Toll Service of)	Docket No. UT-970767
)	
GTE NORTHWEST INCORPORATED)	CERTIFICATE OF SERVICE
)	
Should Be Classified as a)	
Competitive Service.)	
<hr/>		

I certify that on July 3, 1997, I caused an original and nineteen (19) copies of AT&T's Petition to Intervene and Comments, to be delivered by messenger to:

Steve McLellan, Secretary
Washington Utilities
and Transportation Commission
1300 So. Evergreen Park Dr. S.W.
Olympia, Washington 98504

and true and correct copies sent via regular mail, postage prepaid thereon, to:

Richard Potter
GTE Northwest Inc.
1800 41st St.
Everett, WA 98201

Simon ffitich
Assistant Attorney General
Public Counsel
900 4th Ave., Ste. 2000
Seattle, WA 98164-1012

Shannon Smith
Attorney General Office
1400 S. Evergreen Park Dr. SW
P.O. Box 40128
Olympia, WA 98504-0128

Susan Proctor
AT&T Communications Inc.
Room 1575
1875 Lawrence
Denver, CO 80202

CERTIFICATE OF SERVICE - 1
19977217/CERTSERV/7.3.97
Seattle


ORIGINAL

Davis Wright Tremaine LLP
LAW OFFICES
2600 Century Square - 1501 Fourth Avenue
Seattle, Washington 98101-1688
(206) 622-3150 - Fax: (206) 628-7699

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Ron Gayman
AT&T Communications of the
Pacific Northwest, Inc.
2601 4th Ave., 6th Fl.
Seattle, WA 98121-1253

DATED this 3rd day of July, 1997.


Denise A. O'Connor