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2 **WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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4 **IN THE MATTER OF THE APPLICATION OF**  
5 **QWEST CORPORATION**  
6 **REGARDING THE SALE AND TRANSFER OF QWEST**  
7 **DEX TO DEX HOLDINGS, LLC, A NON-AFFILIATE.**

**DOCKET No. UT-021120**

**PETITION OF WEBTEC TO  
INTERVENE PURSUANT TO  
WAC 480-09-430(1)**

8 Pursuant to WAC 480-09-430(1), Washington Electronic Business &  
9 Telecommunications Coalition, ("WEBTEC"), formerly known as Washington  
10 Telecommunications Ratepayers Association for Cost-based and Equitable Rates  
11 ("TRACER"), hereby petitions the Commission for leave to intervene in the above-entitled  
12 docket. In support of its petition, WEBTEC states:  
13

14 1. By its petition, WEBTEC will not broaden the issues in this docket.

15 2. WEBTEC's address is:

16 WASHINGTON ELECTRONIC BUSINESS & TELECOMMUNICATIONS COALITION  
17 601 Union Street, Suite 5450  
18 Seattle, Washington 98101-2327

19 3. The contact information for WEBTEC's attorneys is:

20 Arthur A. Butler  
21 ATER WYNNE LLP  
22 601 Union Street, Suite 5450  
23 Seattle, WA 98101  
24 Voice: (206) 623-4711  
25 Fax: (206) 467-8406  
e-mail: aab@aterwynne.com

Lisa F. Rackner  
ATER WYNNE LLP  
222 S.W. Columbia, Suite 1800  
Portland, OR 97201  
Voice: (503) 226-1191  
Fax: (503) 226-0079  
e-mail: lfr@aterwynne.com

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2 Please note that Mr. Butler will be the primary contact for WEBTEC but will be out of  
3 town from October 1, 2002 through October 20, 2002. Ms. Rackner will be filling in for Mr.  
4 Butler in this matter until his return to the office October 21, 2002. Accordingly, WEBTEC  
5 respectfully requests that both Mr. Butler and Ms. Rackner be included on the service list and  
6 that all communications be directed to both of them.  
7

8 4. WEBTEC is an association of large end-users of telecommunications services.  
9 Its members are large retail customers of Qwest Corporation (“Qwest”). As such, they have a  
10 substantial interest in this proceeding. This is so because the issues in this proceeding –  
11 whether the sale of the Qwest DEX publishing business is in the public interest, whether fair  
12 value is being paid, what is the appropriate regulatory treatment of the sale – affect Qwest’s  
13 overall revenue requirements and, ultimately, the rates it charges its retail customers.  
14

15 In the past, WEBTEC (then known as TRACER) has been granted intervention in  
16 Commission proceedings addressing issues related to Yellow Pages revenue imputation.  
17 Included among those proceedings was Docket No. UT-950200 and the judicial appeals  
18 associated with that case and Docket No. UT-980948.

19 5. WEBTEC’s position in this case is that there must be an appropriate regulatory  
20 treatment of the sale which recognizes the value of the directory publishing business to Qwest  
21 Corporation and its ratepayers.  
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Accordingly, WEBTEC respectfully requests leave to intervene as a full party in this proceeding, with a right of 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 30<sup>th</sup> day of September 2002.

**ATER WYNNE LLP**

By: \_\_\_\_\_  
Arthur A. Butler, WSBA #04678

ATTORNEYS FOR WEBTEC

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2 **CERTIFICATE OF SERVICE**

3 I hereby certify that on the date given below, the original and nineteen (19) copies,  
4 including diskette of same in Word and Adobe formats, of the PETITION OF WEBTEC TO  
5 INTERVENE PURSUANT TO WAC 480-09-430(1), was served via electronic and FedEx Priority  
Overnight properly addressed to the following:

6 Carol J. Washburn, Executive Secretary  
7 WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
8 1300 South Evergreen Park Drive SW  
Olympia, WA 98504

9 and by electronic, legal messenger, and First Class Mail, postage prepaid, properly addressed,  
10 to the following:

11 Lisa Anderl  
12 QWEST CORPORATION  
13 1600 - 7th Ave., Room 3206  
Seattle, WA 98290

14 and by electronic and First Class Mail, postage prepaid, properly addressed, to the following:

15 Russell P. Rowe  
16 William T. Brittan  
17 CAMPBELL, BOHN, KILLIN, BRITTAN & RAY  
270 St. Paul, Suite 200  
Denver, CO 80206

18 Simon J. ffitich  
19 PUBLIC COUNSEL SECTION  
20 OFFICE OF ATTORNEY GENERAL  
900 Fourth Avenue, Suite 2000  
Seattle, WA 98164-1012

21 Gregory J. Trautman, AAG  
22 WUTC STAFF SECTION  
23 OFFICE OF THE ATTORNEY GENERAL  
1400 S. Evergreen Park Dr. SW  
24 P.O. Box 40128  
Olympia, WA 98504-0128

1 Gregory J. Kopta  
2 DAVIS WRIGHT TREMAINE LLP  
3 2600 Century Square  
4 1501 Fourth Avenue  
5 Seattle, WA 98101-1688

6 DATED at Seattle, Washington this 30<sup>th</sup> day of September 2002.

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8 GRETCHEN ELIZABETH EOFF  
9 INDUSTRY SPECIALIST  
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