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Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Petition to Intervene
Docket UT-250544

Dear Mr. Killip:

Enclosed please find a Petition to Intervene by Forged Fiber 37, LLC. In the above-mentioned docket related to the Application of Qwest Corporation, d/b/a CenturyLink QC, for an Order Approving the Transfer of Assets.

If there are any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Collier", written in a cursive style.

David Collier
Lead Regulatory Relations

Enclosures

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

In the Matter of the Application of

QWEST CORPORATION, d/b/a
CenturyLink QC,

For an Order Authorizing the Transfer of
Assets or a Determination That an Order
Authorizing the Transfer Is Not Required

Docket No. UT - 250544

PETITION TO INTERVENE

Forged Fiber 37, LLC (“AT&T”) hereby petitions the Commission for leave to intervene in the above-captioned proceeding through the duly appointed counsel. This petition is filed pursuant to WAC 480-07-355. In support of this request, the undersigned states:

1. Petitioner’s Name and Contact Information. Petitioner’s name is Forged Fiber 37, LLC, a Delaware limited liability company duly authorized to conduct business in the state of Washington. The name, address and telephone number of the person to whom communications should be addressed are:

Richard J. Busch, Esq.
Busch Law Firm PLLC
22500 SE 64th Pl, Ste 130
Issaquah WA 98027
Tel: 425-458-3940
Email: rich.busch@wirelesscounsel.com

2. Petitioner’s Interest in this Proceeding. AT&T is the purchaser of the Mass Market Fiber assets from Qwest Corporation, d/b/a CenturyLink QC (“CenturyLink”), the subject matter of this proceeding, and AT&T has a direct interest in the Commission’s decision in this proceeding. AT&T is a subsidiary of AT&T Inc., a global leader in telecommunications and technology. AT&T and its affiliates provide wireless

and wireline telecommunications and broadband services to consumers located in the United States and businesses globally.¹ AT&T's Consumer Wireline business provides wireline broadband services, fixed wireless broadband services, and legacy telephony voice communication services to residential customers in states other than Washington; its Business Wireline division offers advanced fiber services, fixed wireless services, IP Voice and managed professional services, as well as legacy voice and data services and related equipment, to enterprises in states other than Washington; and its Mobility business provides wireless service and equipment nationwide.²

3. Petitioner's Position with Respect to the Matters in Controversy. AT&T's position with respect to CenturyLink's application is that the proposed transaction is in the public interest and should be approved on an expedited basis. Not only will CenturyLink's AFOR customers suffer no harm as a result of the transaction, the public will benefit greatly from AT&T's acquisition of the Mass Market Fiber assets from CenturyLink. AT&T's position is that consumers and the economy in Washington state will all gain from the proposed transaction. AT&T's financial resources, expertise, and experience will take CenturyLink's Mass Markets fiber business to the next level. The combination will bring increased infrastructure investment and faster deployment of high-speed fiber internet access.

4. Name and Contact Information of Authorized Representatives. AT&T has authorized the following individuals to act as Petitioner's representatives in this proceeding:

¹ AT&T Inc. 2024 Annual Report at 2.

² *Id.* In addition, AT&T's Latin America segment provides wireless service and equipment in Mexico. *Id.*

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Attorney for AT&T

5. Relief Requested. AT&T petitions the Commission for leave to intervene in the captioned proceeding as a party with full rights to participate in the proceeding, including the right to discovery, examine witnesses, file testimony and briefs and be heard at oral argument. A grant of this petition will not delay the proceeding or unduly affect the rights of participating parties. AT&T does not propose to broaden the issues in this proceeding.

Respectfully submitted,

/s/ Richard J. Busch
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Attorneys for:
Forged Fiber 37, LLC

Dated: July 10, 2025