

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Merger of the) DOCKET NO. UT-991358
Parent Corporations of Qwest)
Communications Corporation, LCI) PETITION TO INTERVENE OF
International Telecom Corp., USLD) ADVANCED TELCOM GROUP, INC.
Communications, Inc., Phoenix Networks,)
Inc. and U S WEST Communications, Inc.)
_____)

Pursuant to WAC 480-09-430(1), Advanced TelCom Group, Inc. ("ATG") hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, ATG states as follows:

I. NOTICES

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

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II. IDENTITY OF PETITIONER

ATG is a telecommunications company authorized by the Commission to provide intraexchange and interexchange telecommunications services in Washington. ATG competes with U S WEST Communications, Inc. ("U S WEST"), in the provision of local exchange services and with U S WEST and Qwest Communications Corporation and its subsidiaries ("Qwest") in the provision of intraLATA toll services.

III. INTEREST OF PETITIONER

ATG not only competes with U S WEST in the provisioning of local exchange services but obtains critical facilities and services from U S WEST to access and interconnect with U S WEST's network. ATG also is a significant customer, as well as competitor, of Qwest. U S WEST continues to be the monopoly incumbent local exchange company serving the majority of customers throughout its service territory in Washington, and its proposed merger with Qwest will only increase U S WEST's incentive to favor its own business plans at the expense of competitors' and the public's needs. ATG and other competing local exchange companies thus have a substantial interest in ensuring that the proposed merger of U S WEST and Qwest will not adversely impact the services and facilities they currently provide and that those services and facilities will be provided under the rates, terms, and conditions of agreements, the federal Telecommunications Act of 1996, and Washington law, as applicable. The Commission thus should assert jurisdiction over the proposed merger and condition any approval of that merger on the resulting company's specific commitment to adhere to both the letter and the spirit of its legal

obligations and proof that the quality of service provided to both wholesale and retail customers will not further decline but will improve as a result of the merger.

IV. NATURE OF INTERVENTION

The participation of ATG will be of material value to the Commission in its determination of the issues involved in this proceeding, and ATG's intervention will not broaden those issues or delay the proceedings.

WHEREFORE, ATG respectfully 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 _____ day of September, 1999.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Advanced TelCom Group, Inc.

By _____
Gregory J. Kopta
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