

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON EXCHANGE)	
CARRIER ASSOCIATION, et. al.,)	DOCKET NO. UT-031472
)	
Complainant,)	
)	AT&T'S PETITION
v.)	TO INTERVENE
)	
LOCALDIAL CORPORATION, an)	
Oregon Corporation,)	
)	
Respondent.)	
.....)	

AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services on behalf of TCG Seattle and TCG Oregon (collectively "AT&T"), pursuant to WAC 480-09-430, petition the Washington Utilities and Transportation Commission ("Commission") for leave to intervene in the above-referenced docket. In support of its petition, AT&T states:

1. AT&T is a certified competitive local exchange carrier and long distance provider authorized to do business in the State of Washington.

2. AT&T has a direct and substantial interest in the issues presented in this proceeding because this Commission's determination of the Voice Over Internet Protocol ("VoIP") issues described by the Complainant's complaint and the Court's order¹ could have a dramatic impact on not only the participants in this proceeding, but the entire telecommunications industry in this State. While the precise scope of the above-captioned proceeding is yet unknown, AT&T anticipates that the scope, when

¹ *Washington Exchange Carrier Association, et. al., v. LocalDial Corporation*, Stay Order and Order of Referral to WUTC, D. WA, Case No. CV03-5012 RBL, September 4, 2003.

determined, may directly impact AT&T's business plans and opportunities in this State.

3. AT&T will not broaden the issues of this proceeding, and it will contribute its expertise with regard to the issues at hand.

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

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WHEREFORE, AT&T respectfully requests the Commission grant AT&T's Petition to Intervene in the above-captioned docket with all the rights afforded a full party under Washington law and the rules of the Commission.

Respectfully submitted this 15th day of October 2003.

**AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC. AND
AT&T LOCAL SERVICES ON
BEHALF OF TCG SEATTLE AND
TCG OREGON**

By: _____

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