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1		RECURUS MANAGEMENT	
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3		STATE OF WASH.	
4		UTIL. AND TRANSP. COMMISSION	
5	BEFORE THE WASHINGTON UTILITIES	AND TRANSPORTATION COMMISSION	
6	WASHINGTON EXCHANGE CARRIER		
7	ASSOCIATION, et al.,,	Docket No. UT-031472	
8	Complainant,	PETITION TO INTERVENE	
9	v.		
10	LOCALDIAL CORPORATION, an Oregon Corporation,		
11	Respondent.		
12			
13	The Broadband Communications Association of Washington ("BCAW"),		
14	respectfully petitions for intervention in this matter. In support of its petition, BCAW states the		
15	following:		
16	1. BCAW brings this petition	n under WAC 480-09-430.	
17	2. BCAW will not, by its app	pearance and participation herein, broaden the	
18	issues beyond those stated in this case.		
19	3. BCAW's address is:		
20	Ron Main, Executive Director		
21	Broadband Communicatio 216 First Avenue South, S	Broadband Communications Association of Washington 216 First Avenue South, Suite 260 Seattle, Washington 98104 Telephone: (206) 652-9303 Fax: (206) 652-8297 E-Mail: Rmain@broadbandwashington.org	
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23	Fax: (206) 652-8297		
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1	4. The name and address of BCAW's attorneys are:		
2	Brooks E. Harlow		
3	Miller Nash LLP		
4	4400 Two Union Square 601 Union Street		
5	Seattle, Washington 98101 Phone: (206) 622-8484 Facsimile: (206) 622-7485		
6	E-mail: brooks.harlow@millernash.com		
7	5. BCAW was founded in 1972. BCAW is a trade association whose		
8	membership includes over 15 cable companies providing service to over 95% of cable television		
9	households in Washington State. BCAW has a substantial interest in this proceeding because it		
10	is likely that its members will either consider providing or will actually provide VoIP services in		
11	the near future. One of the issues identified in the Notice of Prehearing Conference is "whether		
12	and to what extent carriers using VoIP technology should be regulated." Thus, effectively the		
13	determinations in this docket may establish the regulatory requirements and framework for all		
14	VoIP providers for the indefinite future. Such determinations will impact the decisions of		
15	BCAW's members on whether and when to begin offering VoIP services, as well as the potential		
16	costs and operational impacts on any future VoIP offerings of BCAW's members.		
17	WHEREFORE, BCAW prays for leave to intervene as a party to this proceeding.		
18	DATED this 15th day of October, 2003.		
19	MILLER NASH LLP		
20			
21	Brooks E. Harlow		
22	WSB No. 11843		
23	Fax: (206) 622-7485 brooks.harlow@millernash.com		
24	Attorneys for Intervenor  Proadband Communications Association		
25	Broadband Communications Association of Washington		
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