

**360networks**

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2009 AUG 22 AM 2:28

July 28, 2008



Carol Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250

Re: Docket No. UT-073033

Dear Commission Staff:

Enclosed for filing with this Commission are an original and twelve (12) copies of **360networks (USA) inc.'s Late-Filed Petition to Intervene**. If you have any questions, please contact me at 303-854-5513 or via email at [mnelson@360.net](mailto:mnelson@360.net).

Respectfully,

A handwritten signature in black ink, appearing to read 'Michel Singer Nelson', written over a faint circular stamp or watermark.

Michel Singer Nelson  
Associate General Counsel  
360networks (USA) inc.

Enclosures  
cc: Service List

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of )  
 ) Docket UT-073033  
 ) (Bifurcated)  
Qwest Corporation, )  
 )  
For Commission Approval of 2007 )  
Additions to Non-Impaired Wire Center )  
List )

2008 AUG 22 AM 9:29

**360NETWORKS (USA) INC.'S Late-Filed Petition to Intervene**

360networks (USA) inc. ("360networks") petitions this Commission for Leave to Intervene in the above-entitled proceeding pursuant to WAC 480-07-355. In support of this Petition, 360networks states as follows:

1. In this docket, Qwest Corporation requested the Commission to approve additions to Qwest's non-impaired wire center list. This list identifies the wire centers in Qwest territory in Washington that are associated with loops and/or transport that are no longer subject to unbundled network element ("UNE") pricing.
2. 360networks is a competitive local exchange carrier ("CLEC") and wholesale local exchange customer of Qwest in Washington. Therefore, 360networks may be directly and substantially affected by this proceeding.
3. The granting of this Petition for Leave to Intervene would serve the purposes of intervention as described by WAC 480-07-355.
4. 360networks will be represented in this proceeding by:

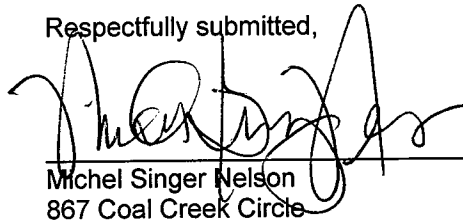
Michel Singer Nelson  
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360networks (USA) inc.  
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303-854-5513 (voice)  
303-854-5100 (fax)  
mnelson@360.net

5. Petitioners failed timely to intervene because this matter just recently came to their attention.
6. Granting this Petition will not unduly broaden the issues or otherwise delay these proceedings.

WHEREFORE, 360networks respectfully requests that the Commission grant this Late-Filed Petition to Intervene and authorize 360networks to participate in the above-entitled proceedings with full rights as a formal party.

Dated this 21<sup>st</sup> day of August, 2008

Respectfully submitted,

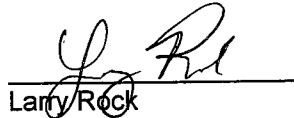


Michel Singer Nelson  
867 Coal Creek Circle  
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Louisville, CO 80027  
Attorney for 360networks (USA) inc.

Certificate of Service

I hereby certify that I have this day served this document upon all parties of record in this proceeding, via regular mail, under WAC 480-07-150

Dated this 22<sup>nd</sup> day of August, 2008.



Larry Rock

Carole Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
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Presiding Administrative Law Judge:  
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