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The Honorable Dennis J. Moss

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

In the Matter of:

COMCAST PHONE OF WASHINGTON,
LLC

Application for Mitigation of Penalties or for
Stay.

Docket No. UT-031459

In the Matter of:

COMCAST PHONE OF WASHINGTON,
LLC

Petition for an Interpretive and Policy
Statement or Declaratory Ruling.

Docket No. UT-031626

MCI'S PETITION TO INTERVENE
[November 12, 2003]

I. INTRODUCTION

1. WorldCom, Inc., on behalf of its regulated subsidiaries in Washington State (n/k/a "MCI"), by and through its attorneys of record, Ater Wynne LLP, hereby submits its Petition to Intervene. In support of this Petition, MCI states as follows:

2. The name and business address of the petitioner is:

MCI
Western Public Policy
707 17th Street, Suite 4200
Denver, CO 80202

ORIGINAL

3. All communications with MCI should be directed to the following persons:

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II. FACTS

4. MCI is a telecommunications company that has been authorized by the Commission to provide local, intraexchange and interexchange telecommunications services throughout Washington State.

5. The above-referenced dockets are intended to examine, among other issues, the interpretation and application of parts of chapter 480-120 WAC, including WAC 480-120-439. As both a local and long-distance provider of telecommunications services in Washington, MCI may be directly affected by the Commission's resolution of this issue.

6. As a carrier with a direct and particular interest in the outcome of these proceedings, MCI's participation will be of material value to the Commission. MCI's intervention will not broaden the issues to be addressed or delay the proceedings, and MCI will coordinate with other parties with similar interests, if any, to minimize any duplication or overlap in presentation of positions.

III. CONCLUSION

7. MCI respectfully requests leave to intervene as a party to these proceedings, 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 12th day of November, 2003.

ATER WYNNE, LLP

By 

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