

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

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WASHINGTON EXCHANGE CARRIER	)	DOCKET NO. UT-031472
ASSOCIATION, et. al.,	)	
	)	
Complainant,	)	
	)	PETITION TO INTERVENE OF
v.	)	UNITED TELEPHONE COMPANY
	)	OF THE NORTHWEST D/B/A
LOCALDIAL CORPORATION, an	)	SPRINT
Oregon Corporation,	)	
	)	
Respondent.	)	
.....	)	

STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

1. United Telephone Company of the Northwest d/b/a Sprint (“Sprint”) asks the Commission, pursuant to WAC 480-09-430 and the September 29, 2003 Notice of Prehearing Conference, to grant Sprint leave to intervene in this proceeding. Sprint has a direct and substantial interest in this proceeding and will not seek to broaden the issues.

2. All communications regarding this proceeding should be addressed to the following person:

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3. Sprint is a local exchange company in Washington. The Commission has asked “whether plaintiffs’ tariffs apply to the VoIP intrastate telephone calls made by LocalDial’s customers using plaintiffs’ facilities.” Because Sprint provides access services to CLECs in

Washington, any ruling by the Commission in this proceeding will have a direct impact on the extent to which its access tariffs apply to VoIP services provided in Sprint's local serving territory.

4. The Commission has also asked "whether and to what extent carriers using VoIP technology should be regulated, if the Commission has the statutory and regulatory authority to do so." A ruling on this issue would have a direct impact on United's obligations in serving VoIP providers.

5. Sprint is local exchange carrier with a direct and substantial interest in the outcome of this proceeding and its participation will be of value to the Commission. In addition, Sprint will not seek to broaden the issues and will coordinating with the parties to this proceeding to limit duplication in testimony, pleadings, or other presentations. Sprint therefore requests that the Commission grant this Petition to Intervene.

Respectfully submitted this 15<sup>th</sup> day of October 2003.

By: 

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