

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of)	Docket No. UT-100820
QWEST COMMUNICATIONS)	LATE-FILED PETITION TO
INTERNATIONAL INC. AND)	INTERVENE OF T-MOBILE WEST
CENTURYTEL, INC.)	CORPORATION
For Approval of Indirect Transfer of control of)	
Qwest Corporation, Qwest Communications)	
Company LLC, and Qwest LD Corp.)	

Pursuant to WAC 480-07-355, T-Mobile West Corporation (“T-Mobile”) hereby petitions to intervene in the above-captioned docket. In support of its petition, T-Mobile sets forth the following information pursuant to the requirements set forth in WAC 480-07-355:

1 The name and address of the Petitioner:

T-Mobile West Corporation
12920 SE 38th Street
Bellevue, WA 98006

2 The name, address, telephone and email information of the persons to whom communications intended for Petitioners should be addressed:

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3 T-Mobile is a CMRS (wireless) provider that provides wireless telecommunications services throughout the state of Washington. Currently, T-Mobile competes with Qwest Corporation (“Qwest”) and CenturyTel Inc. (“CenturyLink”) as well as obtains interconnection and related services and facilities from both Qwest subsidiaries and CenturyLink subsidiaries in Washington such as wireless backhaul services. T-Mobile maintains CMRS interconnection agreements with subsidiaries of both Qwest and CenturyLink in their capacity as incumbent local exchange carriers (“ILECs”).

4 T-Mobile has a substantial interest in the proposed transfer of control of Qwest to CenturyLink. In order to serve its customers in both the Qwest and CenturyTel territories, currently T-Mobile relies on its ability to interconnect with and seek associated services from Qwest, which is the largest incumbent local exchange carrier in Washington and from CenturyLink with over 200,000 access lines in Washington.¹ Moreover, both Qwest and CenturyLink assess access charges to T-Mobile wireless traffic in Washington.

5 T-Mobile desires to participate in this proceeding in order to ensure that the merger of these two ILECs will not adversely impact the competitive landscape in Washington. T-Mobile also seeks to protect its rights to obtain interconnection and related services and facilities from both Qwest and CenturyLink, under appropriate rates and conditions, which it relies upon to provide services to T-Mobile’s customers. As the only wireless provider seeking intervention in this docket, T-Mobile will provide a unique perspective on the competitive landscape.

¹ See Joint Application, ¶ 11.

6 T-Mobile, as a CMRS provider, is not regulated by the Commission. It is not familiar
with Commission practice, such as petitions to intervene because T-Mobile has never sought
to intervene in a Commission proceeding. T-Mobile first became aware of this proceeding on
June 25, 2010 and promptly sought local counsel to prepare this petition.

7 T-Mobile will abide by the schedule established in this docket. T-Mobile's
participation will not broaden the issues because its issues are similar to those of the other
competitive local exchange providers that have been allowed intervention status.

8 Qwest has raised the issue of wireless competition and the provision of wireless fiber
broadband services in the testimony of Mark S. Reynolds (pp. 11, 21, 22). As a wireless
provider dependent upon Qwest for certain interconnection services, T-Mobile will be able to
provide a wireless carriers' perspective that might be possible from the current intervenors.

9 T-Mobile commits to working with the other intervenors in presenting its case so as to
minimize resources and time.

10 T-Mobile anticipates that the various issues and areas of concern that it raises, briefing
and argument that it intends to set forth, as well as evidence that it may provide, will be of
meaningful assistance to the Commission and the other parties to this proceeding when
evaluating the proposed petition and when considering what conditions, if any, are
appropriate to protect the public interest. Permitting T-Mobile leave to intervene will not result
in a broadening of the issues already raised pursuant to the merits of this petition, nor shall T-
Mobile's participation cause a delay of these proceedings.

11 WHEREFORE, T-Mobile requests leave to intervene late as a party to this proceeding,
seeks a right to participate in the full hearing process, including but not limited to the right to
conduct discovery, to brief on issues arising during this proceeding, to have notice of and to

appear during testimony, to produce and cross-examine witnesses, and to be heard either in person or telephonically at oral argument.

RESPECTFULLY SUBMITTED this 29th day of June 2010, in Seattle, Washington.

GRAHAM & DUNN PC



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