

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON EXCHANGE)	
CARRIER ASSOCIATION, et al.,)	
)	
Complainant,)	DOCKET NO. UT-031472
)	
vs.)	
)	
LOCALDIAL CORPORATION, an)	
Oregon Corporation,)	
)	
Respondent)	

**PETITION TO INTERVENE OF
THE VOICE ON THE NET COALITION**

The Voice on the Net (“VON”) Coalition, by and through its attorneys, petitions the Washington Utilities and Transportation Commission (“WUTC” or the “Commission”) for leave to intervene in the above-referenced docket, in accordance with the September 29, 2003 Notice of Prehearing Conference. Pursuant to WAC 480-09-430, the VON Coalition states as follows:

1. Name and address of Petitioner:

The VON Coalition
1718 M Street, NW
PMB #336
Washington, DC 20036

2. Name and address of Attorneys representing Petitioner:

All communications in this proceeding should be directed to:

Bruce D. Jacobs
Glenn S. Richards
Susan M. Hafeli
Shaw Pittman LLP
2300 N Street, N.W.
Washington, D.C. 20037-1128
Telephone: (202) 663-8000
Facsimile: (202) 663-8007

3. *Petitioner's interest in the proceeding:*

The VON Coalition consists of companies that are developing and offering voice products and services for use on the Internet and Internet Protocol (“IP”) networks. Largely through the efforts of VON Coalition members, including Intel, iBasis, ITXC, pulver.com, Sonus Networks, Sylanro, and Texas Instruments, packet-switched voice services are emerging as an exciting new technology benefiting consumers throughout the world.

4. *Petitioner's position in regard to the matter in controversy:*

Since its inception, the VON Coalition has consistently advocated that federal and state regulators maintain current policies of refraining from extending legacy regulations to Internet services and applications, including VoIP.

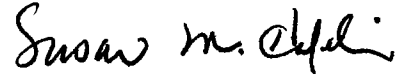
Among the issues to be addressed in this proceeding are “whether and to what extent carriers using VoIP technology should be regulated, if the Commission has the statutory and regulatory authority to do so.” Notice of Prehearing Conference, Issue 2, page 2. The Commission’s stated intent to consider its regulatory authority with respect to VoIP gives the VON Coalition a direct and material interest in this proceeding.

Intervention by the VON Coalition will not broaden the issues to be addressed. Further, its participation in this proceeding will be of material value to the Commission. The requested intervention is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, the VON Coalition respectfully requests that the Commission grant its
Petition to Intervene and grant it all the rights of a party.

Respectfully submitted,

THE VON COALITION



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Glenn S. Richards
Susan M. Hafeli
Shaw Pittman LLP
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Washington, D.C. 20037-1128
Telephone: (202) 663-8000

Dated: October 15, 2003