

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

WASHINGTON INDEPENDENT
TELECOMMUNICATIONS
ASSOCIATION and LEWIS RIVER
TELEPHONE COMPANY, D/B/A TDS
TELECOM

For Declaratory Ruling

Docket No. UT-083056

PETITION TO INTERVENE

1 The Broadband Communications Association of Washington (“BCAW”), respectfully
petitions for intervention in this matter. In support of its petition, BCAW states the
following:

2 BCAW brings this petition under WAC 480-07-355.

3 BCAW will not, by its appearance and participation herein, broaden the issues
beyond those stated in this case.

4 BCAW's address is:

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216 First Avenue South, Suite 260
Seattle, Washington 98104
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E-Mail: Rmain@broadbandwashington.org

5 The name and address of BCAW's attorneys are:

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David L. Rice
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6 BCAW was founded in 1972. BCAW is a trade association whose membership includes over 15 cable companies providing service to over 95% of cable television households in Washington State. According to the Notice of Petition an issue in this docket is whether a VoIP service provider (Comcast) has rights to negotiate interconnection pursuant to 47 U.S.C. § 251 with an ILEC or whether Comcast is acting as a telecommunications carrier offering telecommunications services and subject to WUTC regulation. BCAW has a substantial interest in this proceeding because it has members that provide similar VoIP services to Comcast and the order in this docket may have a substantial direct or indirect impact on the rights and obligations of its members.

7 WHEREFORE, BCAW prays for leave to intervene as a party to this proceeding.

DATED this 25th day of November, 2008

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