

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

<b>WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,</b>	)	
	)	<b>Docket No. UT-040788</b>
<b>Complainant,</b>	)	
v.	)	<b>MCI PETITION TO</b>
	)	<b>INTERVENE</b>
<b>VERIZON NORTHWEST INC.,</b>	)	
	)	
<b>Respondent.</b>	)	
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COMMISSION

Pursuant to WAC 480-07-355, MCI, Inc. ("MCI") hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, MCI states as follows:

I.

The names, addresses, and telephone numbers of the persons to whom communications should be addressed are:

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II.

MCI is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. MCI currently competes with, and obtains services and facilities from, Verizon Northwest Inc. ("Verizon") in the provision of toll and other intraexchange and interexchange services.

### III.

MCI has a substantial interest in the rates that Verizon charges for intrastate tariffed services and facilities that Verizon provides to MCI and other competing toll and local service providers. MCI, for example, is one of the largest purchasers of Verizon's intrastate switched access services. MCI also has an interest in the rates that Verizon charges for services provided to its end-user customers to the extent that those services include facilities or services that MCI and other competitors must obtain from Verizon, to ensure that MCI has a full and fair opportunity to compete. MCI, therefore, has a direct and substantial interest in the rates that the Commission establishes for Verizon's intrastate tariffed services in this proceeding.

Initially with its filing, Verizon petitioned for a bifurcated proceeding, asking the Commission to determine the revenue requirement separately from the "rate design." At that point, interested parties were not advised of the particular services to which Verizon's proposed rate increases would apply. Although MCI was interested in the

proceeding, MCI was not willing or able to expend resources as a party to this proceeding without knowing the particular services that would be affected by rate increases. MCI planned to intervene in the section of the case addressing the particular rate increases but not in the section of the case addressing Verizon's revenue requirement.

The Commission denied Verizon's bifurcation request, however. Accordingly, on July 23, 2004, Verizon filed its proposed tariffs, detailing its suggested increases. Affected services include intrastate special access services, which MCI purchases from Verizon in Washington.

#### IV.

The evidence to be presented by MCI will be of material value to the Commission in its determination of the issues involved in this proceeding, and MCI's intervention will not broaden those issues or delay the proceedings.

WHEREFORE, MCI prays for leave to intervene as a party to this proceeding, 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 \_\_\_\_ day of August, 2004.

**MCI**

By \_\_\_\_\_  
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