

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	
)	Docket No. UT-031459
COMCAST PHONE OF)	
WASHINGTON, LLC)	
)	
Application for Mitigation of)	
Penalties or for Stay)	
_____)	
)	
In the Matter of)	
)	Docket No. UT-031626
COMCAST PHONE OF)	
WASHINGTON, LLC)	TIME WARNER TELECOM
)	PETITION TO INTERVENE
Petition for Interpretive and Policy)	
Statement or Declaratory Ruling)	
_____)	

Time Warner Telecom of Washington, LLC (“TWTC”), pursuant to WAC 480-09-430(1), hereby requests leave to intervene in this proceeding. In support of its request, TWTC states as follows:

I.

All communications with TWTC should be directed to the following persons:

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II.

TWTC is a facilities-based telecommunications company that is authorized by the Commission to provide intraexchange and interexchange telecommunications services throughout the state of Washington.

III.

TWTC has a substantial interest in the issues to be addressed in this proceeding. TWTC provides local exchange service to customers in Washington, and issues related to whether and how the service quality reporting obligations in WAC 480-120-439 apply to competing local exchange companies (“CLECs”) will directly and materially impact TWTC and the manner in which it provides telecommunications services in this state.

IV.

As a local exchange service provider with a direct and particular interest in the outcome of this proceeding, TWTC’s participation will be of material value to the Commission. TWTC’s intervention will not broaden the issues to be addressed or delay the proceedings.

WHEREFORE, TWTC respectfully requests leave to intervene as a party to this proceeding, with a right to discovery, to have notices 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.

DATED this 12th day of November, 2003.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Time Warner Telecom of Washington,
LLC.

By _____
Gregory J. Kopta