

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Development of	)	
Universal Terms and Conditions for	)	DOCKET NO. UT-011219
Interconnection and Network	)	
Elements to be Provided by	)	PETITION OF TIME WARNER
	)	TELECOM OF WASHINGTON
VERIZON NORTHWEST, INC.	)	TO INTERVENE
_____	)	

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

I.

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

Gregory J. Kopta  
DAVIS WRIGHT TREMAINE LLP  
2600 Century Square  
1501 Fourth Avenue  
Seattle, WA 98101-1688  
voice: (206) 628-7692  
facsimile: (206) 628-7699  
e-mail: gregkopta@dwt.com

Brian Thomas  
Vice President of Regulatory  
Time Warner Telecom  
520 SW Sixth Avenue, Suite 300  
Portland, OR 97229  
voice: (503) 416-1588  
facsimile: (503) 416-1876  
e-mail: brian.thomas@twtelecom.com

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. TWTC offers local exchange and interexchange services in competition with Verizon Northwest, Inc. (“Verizon”). Pursuant to the federal Telecommunications Act of 1996 (“Act”), TWTC

entered into an interconnection agreement with Verizon, which the Commission approved and which currently is in full force and effect.

### III.

As a competitor and a party to an interconnection agreement with Verizon, TWTC has a substantial interest in the issues to be addressed in this proceeding. TWTC obtains interconnection trunks, collocation, and other facilities and services from Verizon under the terms and conditions of the parties' interconnection agreement. In this proceeding, the Commission will establish universal interconnection contract terms and conditions under which Verizon must offer to provide competitors with access to, and interconnection with, its network. TWTC's current interconnection agreement will soon expire, and TWTC will need to renegotiate or otherwise obtain replacement terms and conditions. The Commission's establishment of universal terms and conditions that will be available to TWTC and other competing local exchange companies ("CLECs"), therefore, will directly and materially affect TWTC and its ability to provide telecommunications services in Washington.

### IV.

As a CLEC with a direct and particular interest in the outcome of these proceedings, 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, and TWTC will coordinate with other parties with similar interests to minimize any duplication or overlap in presentation of positions.

WHEREFORE, TWTC respectfully requests 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 \_\_\_\_\_, 2002.

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

By \_\_\_\_\_  
Gregory J. Kopta  
WSBA No. 20519