

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

**WEBTEC'S PETITION TO
INTERVENE**

1. Pursuant to WAC 480-07-355, Washington Electronic Business and Telecommunications Coalition ("WeBTEC") hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, WeBTEC states as follows:
2. WeBTEC's address and telephone number are:

WeBTEC
601 Union Street, Suite 1501
Seattle, WA 98101-2341
Voice: (206) 623-4711
3. The names, addresses, telephone numbers, and other contact information of WeBTEC's

attorneys are:

Arthur A. Butler
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4. WeBTEC is an association of large end-users of communications services. Its members have facilities located in numerous locations throughout the state of Washington, including areas served by Washington Independent Telephone Association (“WITA”) member companies. According to the Petition filed by WITA and TDS Telecom 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 incumbent local exchange company (“ILEC”) or whether Comcast is acting as a telecommunications carrier offering telecommunications services subject to WUTC regulation. WeBTEC has a substantial interest in the subject matter of this proceeding because its members currently use VoIP services and plan to continue to use, and perhaps expand their use of, VoIP services in the future. The resolution of the issue identified above could have a significant impact on the availability and/or the terms of service for those VoIP services from numerous VoIP providers. Further, any competitive constraint provided by VoIP services on the prices and quality of traditional telecommunications services purchased by WeBTEC members could also be negatively impacted. In short, the order eventually issued in this docket could have a significant direct and indirect impact on the services available to WeBTEC members to satisfy their communications needs and the prices and quality of those services.

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

6. WHEREFORE, WeBTEC 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 4th day of November, 2008.

ATER WYNNE LLP

By



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Attorneys for WeBTEC

CERTIFICATE OF SERVICE

I hereby certify that I have this 26th day of November, 2008, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

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I hereby certify that I have this 26th day of November, 2008, served a true and correct copy of the foregoing document upon parties of record, via the method(s) noted below, properly addressed as follows:

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