

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 AT&T
)	TO INTERVENE
VERIZON NORTHWEST, INC.)	
_____)	

AT&T Communications of the Pacific Northwest, Inc., TCG Seattle, and TCG Oregon (collectively "AT&T"), pursuant to WAC 480-09-430(1), hereby requests leave to intervene in the above-entitled dockets. In support of its request, AT&T states as follows:

I.

All communications with AT&T should be directed to the following persons:

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II.

AT&T is a facilities-based telecommunications company that is authorized by the Commission to provide intraexchange and interexchange telecommunications services throughout the State of Washington. AT&T offers local exchange and interexchange services in competition with Verizon Northwest, Inc. (“Verizon”). Pursuant to the federal Telecommunications Act of 1996 (“Act”), AT&T 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, AT&T has a substantial interest in the issues to be addressed in this proceeding. AT&T obtains interconnection trunks 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. AT&T’s current interconnection agreement will soon expire, and AT&T 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 AT&T and other competing local exchange companies (“CLECs”) will directly and materially affect AT&T 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, AT&T’s participation will be of material value to the Commission. AT&T’s intervention will not broaden the issues to be addressed or delay the proceedings, and AT&T will coordinate with other parties with similar interests to minimize any duplication or overlap in presentation of positions.

WHEREFORE, AT&T 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 August, 2002.

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By _____
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