

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 FOX
)	COMMUNICATIONS CORP.
VERIZON NORTHWEST, INC.)	TO INTERVENE
_____)	

Fox Communications Corp. (“Fox”), pursuant to WAC 480-09-430(1), hereby requests leave to intervene in the above-entitled dockets. In support of its request, Fox states as follows:

I.

All communications with Fox 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

Dan Horton
Chief Technology Officer
Fox Communications Corp.
5210 Carillon Point
Kirkland, WA 98033
voice: (425) 649-1360
facsimile: (888) 926-7371
e-mail: dhorton@whoscalling.com

II.

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

WHEREFORE, Fox 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.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Fox Communications Corp.

By _____

Gregory J. Kopta
WSBA No. 20519