

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND )  
TRANSPORTATION COMMISSION, )  
 ) Docket No. UT-040788  
Complainant, )  
 ) XO PETITION TO  
v. ) INTERVENE  
 )  
VERIZON NORTHWEST INC., )  
 )  
Respondent. )  
\_\_\_\_\_)

Pursuant to WAC 480-07-355, XO Washington, Inc. (“XO”) hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, XO states as follows:

I.

The names, addresses, and telephone numbers of the persons to whom communications should be addressed are:

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II.

XO is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout

Washington. XO currently competes with, and obtains services and facilities from, Verizon Northwest Inc. (“Verizon”) in the provision of intraexchange and interexchange services.

### III.

XO has a substantial interest in the rates that Verizon charges for intrastate tariffed services and facilities that Verizon provides to XO and other competing service providers. On July 23, 2004, Verizon filed proposed tariffs in which it identified for the first time the rates that Verizon is proposing for intrastate tariffed services that Verizon provides to competing companies. Verizon proposes to raise its intrastate special access service rates by up to 56%, which will have a significant impact on XO’s ability to provide effectively competitive services in Washington. XO, therefore, has a direct and substantial interest in the rates that the Commission establishes for Verizon’s intrastate tariffed services in this proceeding.

### IV.

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

WHEREFORE, XO 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 \_\_\_\_ day of August, 2004.

DAVIS WRIGHT TREMAINE LLP  
Attorneys for XO Washington, Inc.

By \_\_\_\_\_  
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