

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	
)	Docket No. UT-040788
Complainant,)	
)	TIME WARNER TELECOM PETITION
v.)	TO INTERVENE
)	
VERIZON NORTHWEST INC.,)	
)	
Respondent.)	
_____)	

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

I.

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

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

Brian D. Thomas
Vice President, Regulatory
Time Warner Telecom
223 Taylor Avenue North
Seattle, WA 98109-5017
Voice: (206) 676-8090
Fax: (206) 676-8001
E-mail: brian.thomas@twtelecom.com

II.

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

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

III.

TWTC has a substantial interest in the rates that Verizon charges for intrastate tariffed services and facilities that Verizon offers to TWTC 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 the ability of TWTC and other competitors to use such services to provide effectively competitive local services in Washington. TWTC, 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 TWTC will be of material value to the Commission in its determination of the issues involved in this proceeding, and TWTC will coordinate and consolidate its evidence and briefing to the extent possible with parties taking the same position on the issues. TWTC’s intervention also will not broaden those issues or delay the proceedings.

WHEREFORE, TWTC 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 8th day of September, 2004.

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

By _____
Gregory J. Kopta
WSBA No. 20519