



allegiancetelecom,inc.

1919 M. Street, NW
Suite 420
Washington, D.C. 20036
202/464-1800 phone
202/464-0762 fax

Morton J. Posner
Regulatory Counsel
Direct Dial: (202) 464-1792
Morton.Posner@algx.com

April 23, 2002

By Overnight Delivery

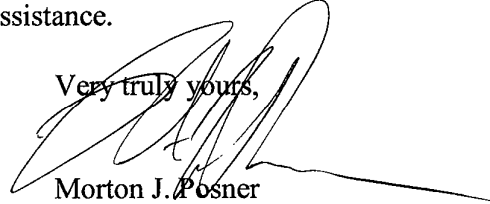
File Clerk
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504-7250

Re: In the Matter of the Review of Unbundled Loop and Switching Rates and Review of the Deaveraged Zone Rate Structure
Docket No. UT-023003

Dear File Clerk:

Enclosed for filing is the Petition to Intervene of Allegiance Telecom of Washington, Inc. in the above-referenced proceeding. The original and 20 copies, with one designated "stamp and return," are included. Please date stamp the copy and return in the envelope provided. Thank you for your assistance.

Very truly yours,



Morton J. Posner

Counsel for Allegiance Telecom of
Washington, Inc.

Enclosures
cc(w/enc): Service List
Ms. Andrea Harris

RECEIVED
RECORDS MANAGEMENT
02 APR 24 AM 10:07
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of the Review of)
Unbundled Loop and Switching Rates and)
Review of the Deaveraged Zone Rate)
Structure)

DOCKET NO. UT-023003

RECEIVED
RECORDS MANAGEMENT
02 APR 24 AM 10: 07
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

**PETITION TO INTERVENE
OF ALLEGIANCE TELECOM OF WASHINGTON, INC.**

Pursuant to WAC 480-09-430(1), Allegiance Telecom of Washington, Inc. (Allegiance) hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, Allegiance states as follows:

1. Communications in this docket should be directed to:

Morton J. Posner, Esq.
Allegiance Telecom, Inc.
1919 M Street, NW, Suite 420
Washington, DC 20036
(202) 464-1792
(202) 464-0762 (fax)
morton.posner@algx.com

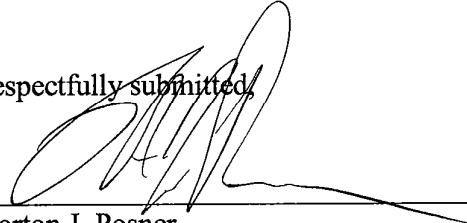
Ms. Andrea Harris
Allegiance Telecom, Inc.
2101 Webster, Suite 1580
Oakland, CA 94612
(510) 473-1155
(510) 208-0235 (fax)
andrea.harris@algx.com

2. Allegiance is a competitive local exchange carrier authorized to provide service in Washington State, in competition with Qwest and Verizon Northwest. Allegiance has a substantial interest in this proceeding because it will review the costs of service that Allegiance incurs by purchasing Qwest's and Verizon's unbundled network elements. Allegiance has knowledge and expertise that will assist the Commission and the parties in addressing the issues presented in these proceedings.

3. Allegiance's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

Wherefore, Allegiance respectfully requests that the Commission grant its Petition to Intervene.

Respectfully submitted,



Morton J. Posner
Regulatory Counsel
Allegiance Telecom, Inc.
1919 M Street, NW, Suite 420
Washington, DC 20036
(202) 464-1792
(202) 464-0762 (fax)
Morton.Posner@algx.com

Counsel for Allegiance Telecom of Washington,
Inc.

Dated: April 23, 2002

CERTIFICATE OF SERVICE

I, Morton J. Posner, hereby certify that on this 23d day of April, 2002, I served the
Petition to Intervene of Allegiance Telecom of Washington, Inc. in Docket No. UT-023003 on
the persons on the attached service list by U.S. mail.

A handwritten signature in black ink, appearing to read 'Morton J. Posner', is written over a horizontal line.

Morton J. Posner

**In the Matter of the Review of Unbundled Loop and Switching Rates and
Review of the Deaveraged Zone Rate Structure**

Docket No. UT-023003

Lisa A. Anderl
Qwest Corporation
1600 7th Ave., Rm. 3206
Seattle, WA 98101

Gregory J. Kopta
Davis Wright Tremaine
2600 Century Square
1501 Fourth Ave.
Seattle, WA 98101-1688

Jennifer McClellan
Hunton & Williams
951 East Byrd Street
Richmond, VA 23219

Arthur A. Butler
Ater Wynne
601 Union Street, Suite 5450
Seattle, WA 98101

Brooks Harlow
Miller Nash
601 Union Street, Suite 4400
Seattle, WA 98101-2352

Michel Singer Nelson
MCI/WorldCom, Inc.
707 17th Street, Suite 4200
Denver, CO 80202

K. Megan Doberneck
Covad Communications Company
7901 Lowry Boulevard
Denver, CO 80230

Dennis D. Ahlers
Eschelon Telecom, Inc.
730 Second Ave. South, Suite 1200
Minneapolis, MN 55402-6349

Simon ffitich
Assistant Attorney General
900 Fourth Avenue #2000
Seattle, WA 98164

Shannon Smith
Assistant Attorney General
1400 S. Evergreen Park Dr. SW
Olympia, WA 98504-0128