

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)
TRANSPORTATION COMMISSION,)
) Docket No. UT-050606
Complainant,)
)
v.) PETITION TO INTERVENE OF
) INTELLIGENT COMMUNITY SERVICES
)
Inland Telephone Company,)
)
Respondent.)
_____)

Pursuant to WAC 480-07-355, Intelligent Community Services, Inc. (“ICS”) hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, ICS 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.

ICS is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. ICS initially intends to provide services in the Roslyn exchange of Inland Telephone Company (“Inland”), specifically in the Suncadia resort area.

III.

ICS has a substantial interest in Inland’s proposal to redefine the geographic boundaries of the Roslyn exchange to exclude the Suncadia resort area. Such a redefinition would directly and significantly impact ICS’s ability to serve customers in the Suncadia resort by altering the regulatory requirements that would apply to the company serving that area. Such alterations include virtually precluding access to universal service funds, limiting ICS’s ability to obtain interconnection with, and services from, Inland on reasonable rates, terms, and conditions, and potentially subjecting ICS to treatment as an incumbent local exchange carrier. ICS, therefore, has a direct and substantial interest in the outcome of this proceeding.

IV.

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

WHEREFORE, ICS 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 10th day of August, 2005.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Intelligent Community Services, Inc.

By _____
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