

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES)	
AND TRANSPORTATION COMMISSION,)	
)	DOCKET NO. UT – 040788
Complainant,)	
v.)	PETITION TO INTERVENE
)	ON BEHALF OF
VERIZON NORTHWEST INC.)	INTEGRA TELECOM OF
)	WASHINGTON, INC.
Respondent.))	

Integra Telecom of Washington, Inc. (“Integra”) hereby requests leave to intervene as a party in the above-entitled docket. In support of its request, Integra states as follows:

I.

All communications with Integra should be directed to the following persons:

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II.

Integra is a facilities-based telecommunications company that is authorized by the Commission to provide intraexchange and interexchange telecommunications services throughout the State of Washington.

III.

The above docket involves the examination of rates to be charged by Verizon in the State of Washington. Integra operates in Verizon territory and competes directly with Verizon.

Integra also purchases services directly from Verizon and under its interconnection agreement with Verizon purchase services on a resale rate.

IV.

Integra has substantial interest in the outcome of these proceedings, and Integra's participation will be valuable to the Commission. Integra's intervention will not broaden the issues to be addressed or delay the proceedings, and Integra will coordinate with other parties with similar interests to minimize any duplication or overlay in presentation of positions. Further, on May 13, 2004, Integra requested interested party status in the above-entitled docket and has been following the proceedings.

WHEREFORE, Integra respectfully requests leave to intervene as a party to this proceeding, with a right of 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.

Dated this 13th day of September, 2004.

Respectfully submitted,

INTEGRA TELECOM OF WASHINGTON, INC.

By: _____
Karen J. Johnson
Corporate Regulatory Attorney
WSBA # 26875

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Petition to Intervene in Docket No. UT-040788 and Signature Page from Order No. 2 and the Certification from Order No. 8 on the following parties:

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I further certify that said copies were served by placing them in sealed envelopes addressed to said party's/attorneys' last know addresses as shown and deposited in the United States Mail at Portland, Oregon, and that the postage thereon was prepaid and also via electronic mail to the addresses indicated.

DATED this 13th day of September, 2004.

Karen J. Johnson, WSBA #26875
Corporate Regulatory Attorney