

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of	)	
	)	DOCKET NO. UT-100820
QWEST COMMUNICATIONS	)	
INTERNATIONAL INC. AND	)	COVAD PETITION TO INTERVENE
CENTURYTEL, INC.	)	
	)	
For Approval of Indirect Transfer of Control of	)	
Qwest Corporation, Qwest Communications	)	
Company LLC, and Qwest LD Corp.	)	

1. Pursuant to WAC 480-07-355, Covad Communications Company (“Covad”) hereby petitions the Commission for leave to intervene in this docket. As grounds for intervention, Covad states as follows:

I.

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

Gregory J. Kopta  
DAVIS WRIGHT TREMAINE LLP  
1201 Third Ave.  
Suite 2200  
Seattle, WA 98101  
Voice: (206) 757-8079  
Fax: (206) 757-7079  
Email: [gregkopta@dwt.com](mailto:gregkopta@dwt.com)

Katherine K. Mudge  
Director, State Affairs & ILEC Relations  
Covad Communications Company  
7000 N. Mopac Expressway, 2d Floor  
Austin, Texas 78731  
Voice: (512) 514-6380  
Fax: (512) 514-6520  
Email: [kmudge@covad.com](mailto:kmudge@covad.com)

II.

3. Covad is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. Covad currently competes with, and obtains interconnection and

related services and facilities from, Qwest Corporation (“Qwest”) in the provision of Covad’s telecommunications services.

### III.

4. Covad has a substantial interest in the proposed transfer of control of Qwest to CenturyTel. Qwest is the largest incumbent local exchange carrier (“ILEC”) in Washington. Covad relies on interconnection with, and related services and facilities obtained from, Qwest to offer and provide service to customers in Qwest’s service territory. Covad seeks to participate in this proceeding to ensure that the proposed transaction will not adversely impact competition in Washington or Covad’s rights and ability to obtain the interconnection and related services and facilities it needs to provide its telecommunications services.

### IV.

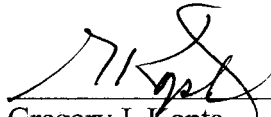
5. The evidence, if any, and briefing presented by Covad will be of material value to the Commission in its determination of the issues involved in this proceeding, and Covad’s intervention will not broaden those issues or delay the proceedings.

WHEREFORE, Covad 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 24<sup>th</sup> day of May 2010.

Katherine K. Mudge  
Director, State Affairs & ILEC Relations  
Covad Communications Company  
7000 N. Mopac Expressway, 2d Floor  
Austin, Texas 78731

DAVIS WRIGHT TREMAINE LLP



---

Gregory J. Kopta  
WSBA No. 20519

Attorneys for Covad Communications  
Company