

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Merger of the ) DOCKET NO. UT-991358  
Parent Corporations of Qwest )  
Communications Corporation, LCI ) PETITION TO INTERVENE OF  
International Telecom Corp., USLD ) GST TELECOM WASHINGTON, INC.  
Communications, Inc., Phoenix Networks, )  
Inc. and U S WEST Communications, Inc. )  
\_\_\_\_\_)

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

**I. NOTICES**

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

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## **II. IDENTITY OF PETITIONER**

GST is a telecommunications company authorized by the Commission to provide intraexchange and interexchange telecommunications services in Washington. GST currently competes with U S WEST Communications, Inc. ("U S WEST"), in the provision of local exchange service and with U S WEST and Qwest Communications Corporation and its subsidiaries ("Qwest") in the provision of intraLATA toll services.

## **III. INTEREST OF PETITIONER**

GST obtains critical facilities and services from U S WEST to access and interconnect with U S WEST's network in order to compete with U S WEST in the provisioning of local and interexchange services. U S WEST continues to be the monopoly incumbent local exchange company serving the majority of customers throughout its service territory in Washington. GST and other competing local exchange companies thus have a substantial interest in ensuring that any change in U S WEST ownership and management will not adversely impact the services and facilities U S WEST currently provides and that those services and facilities will be provided under the rates, terms, and conditions of its interconnection agreements, the federal Telecommunications Act of 1996, and Washington law. Indeed, the Commission should assert jurisdiction over the proposed merger and should condition any approval of that merger on a specific commitment from U S WEST that it will adhere to both the letter and the spirit of its legal obligations and that the quality of service U S WEST provides to both wholesale and retail customers will not be further degraded but will improve as a result of the proposed merger with Qwest.

#### IV. NATURE OF INTERVENTION

The participation of GST will be of material value to the Commission in its determination of the issues involved in this proceeding, and GST's intervention will not broaden those issues or delay the proceedings. GST's petition to intervene is being filed less than two weeks after the prehearing conference in this proceeding, but no party would be prejudiced by GST's intervention. In addition, GST accepts and will adhere to the schedule established at the prehearing conference and will coordinate its participation with other similarly situated parties to minimize any duplication.

WHEREFORE, GST respectfully requests 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 \_\_\_\_ day of October, 1999.

DAVIS WRIGHT TREMAINE LLP  
Attorneys for GST Telecom Washington, Inc.

By \_\_\_\_\_  
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