

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

| | | |
|--------------------------------------|---|------------------------------|
| In the Matter of the Petition of |) | |
| |) | Docket No. UT-061625 |
| QWEST CORPORATION |) | |
| |) | TIME WARNER TELECOM PETITION |
| To be Regulated Under an Alternative |) | TO INTERVENE |
| Form of Regulation Pursuant to |) | |
| RCW 80.36.135 |) | |
| _____ |) | |

Pursuant to WAC 480-07-355, Time Warner Telecom of Washington, LLC ("TWTC") hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, TWTC 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.

TWTC is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. TWTC currently competes with, and obtains services and facilities from, Qwest Corporation (“Qwest”) in the provision of intraexchange and interexchange services.

III.

TWTC has a substantial interest in the extent to which Qwest’s services are subject to an alternative form of regulation (“AFOR”). TWTC and other competitive local exchange companies (“CLECs”) have urged the Commission in Docket No. UT-053025 to review Qwest’s pricing of the high capacity circuits that Qwest offers to competitors, including Qwest’s intrastate special access services. Those services currently are classified as competitive. If the Commission were to remove that classification, however, Qwest’s intrastate special access services would then be governed under the AFOR that Qwest has proposed, which would restrict the Commission’s ability to establish fair, just, reasonable, and sufficient rates for those services. TWTC, therefore, seeks to intervene in this proceeding to preserve its full rights to Commission oversight of Qwest’s intrastate special access services as those services are provided to competing service providers.

IV.

The evidence, if any, and briefing presented by TWTC will be of material value to the Commission in its determination of the issues involved in this proceeding, and TWTC’s

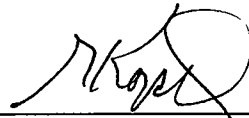
intervention will not broaden those issues or delay the proceedings.

WHEREFORE, TWTC 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 1st day of November, 2006.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Time Warner Telecom of
Washington, LLC

By



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