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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION



Carole J. Washburn, Executive Secretary  
Washington Utilities & Transportation Commission  
1300 S Evergreen Park Drive SW  
PO Box 47250  
Olympia WA 98504-7250

**Re: DOCKET NO. UT-011219**  
**In the Matter of the Development of Universal Terms and Conditions for**  
**Interconnection Network Elements Provided by VERIZON NORTHWEST,**  
**INC.**

Dear Executive Secretary Washburn:

Enclosed are the original and 15 copies of the PETITION OF ESCHELON TELECOM OF WASHINGTON, INC. FOR INTERVENTION in the above-entitled docket. Also enclosed are an Affidavit of Service and Service List.

Sincerely,

Dennis D. Ahlers  
Senior Attorney  
Eschelon Telecom, Inc.  
(612) 436-6249 (Direct Voice)  
(612) 436-6349 (Direct Fax)  
(612) 436-6816 (Department Fax)

Enclosures

cc: Service List

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Development of Universal  
Terms and Conditions for Interconnection and  
Network Elements to be Provided by  
VERIZON NORTHWEST, INC.

DOCKET NO. UT-011219

PETITION OF ESCHELON TELECOM OF  
WASHINGTON, INC. FOR INTERVENTION

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

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

Dennis D. Ahlers  
Senior Attorney  
Eschelon Telecom, Inc.  
730 Second Avenue South, Suite 1200  
Minneapolis, MN 55402-2456  
Phone (612) 436-6249

On June 20, 2002, Eschelon filed a Petition for Intervention in this matter. On August 6, 2002, a prehearing conference was held before Administrative Law Judge Theodora Mace. Counsel for Eschelon did not enter an appearance at the prehearing conference and Eschelon's Petition was therefore denied. Third Supplemental Order, at 2. Eschelon has reviewed the matter and after further consideration has decided that it still wishes to participate in this matter as an Intervenor. Therefore, Eschelon requests that the Commission grant this second Petition for Intervention for the following reasons:

Counsel was absent from the office for two and one-half weeks encompassing the date of the prehearing conference due to a sudden intense illness that has since been diagnosed as Lyme's disease. Due to the illness and prolonged absence Counsel was not available to appear at the prehearing conference. Furthermore, due to the illness and an oversight Counsel failed to arrange for a substitute to participate in the prehearing conference. Upon receiving the Third Supplemental Order, Eschelon has reexamined its interest in the proceeding and has decided that it has a continuing desire to participate in this matter.

Eschelon will take the matter as it is and its presence will not delay or complicate the proceedings. Eschelon will abide by the procedural schedule determined in the Third Supplemental Order. The schedule for the proceedings is such that intervention at this date

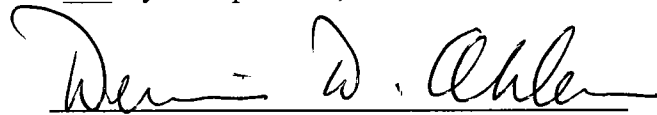
should not be an issue. In fact, it is Eschelon's understanding that Verizon has requested a two-week extension for the filing of its model agreement.

Eschelon has a substantial interest in the issues raised in this proceeding. As a certified competitive telecommunications carrier in the State of Washington, Eschelon competes with incumbent carriers, including Verizon Northwest, Inc., in order to provide consumers with competitive alternative telecommunications services. Eschelon interconnects with Verizon pursuant to an interconnection agreement approved by the Commission. Therefore, Eschelon has a substantial and significant interest in the terms and conditions for interconnection that will be the subject matter of this proceeding.

Eschelon respectfully requests that its intervention in this proceeding be granted. Eschelon's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding. As stated, Eschelon will abide by the procedural schedule adopted for this case.

WHEREFORE, Eschelon prays for leave to intervene as a party to this proceeding.

RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of September, 2002.



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In the Matter of the Development of Universal Terms  
and Conditions for Interconnection Network Elements  
Provided by VERIZON NORTHWEST, INC.

WASHINGTON UTILITIES & TRANSPORTATION  
COMMISSION

DOCKET NO. UT-011219

SERVICE LIST

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