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**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of
VERIZON COMMUNICATIONS INC., and
MCI, INC.
For Approval of Agreement and Plan of Merger

DOCKET NO. UT-050814
PETITION TO INTERVENE
of INTEGRA TELECOM OF
WASHINGTON, INC.

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1. Pursuant to WAC 480-07-355 and the Commission's Notice of Prehearing Conference served June 3, 2005, INTEGRA TELECOM OF WASHINGTON, INC., a Washington corporation ("Integra"), hereby seeks permission to intervene in the above-referenced docket. Integra's address is 1201 N.E. Lloyd Blvd., Suite 500, Portland, OR 97232.

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2. Integra will be represented in this proceeding by John (Jay) P. Nusbaum, a member in good standing of the bar of the State of Oregon. His address is 1201 N.E. Lloyd Blvd., Suite 500, Portland, OR 97232.

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3. Integra's interest in this proceeding arises from Integra's status as a facilities-based competitive local exchange carrier ("CLEC") that provides local, long distance, and Internet services to small and medium-sized businesses in Washington. Integra is a direct competitor of Verizon and provides long distance service over MCI's network, among others. Accordingly, Integra has an interest in the outcome of this proceeding and how it may affect Integra's ability to provide competitive telecommunications service in Washington.

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4. The matters in controversy include whether the Commission has jurisdiction to approve the agreement and plan of merger between Verizon and MCI and, if so, whether the Commission should approve the merger. Integra's position, which Integra will support during

1 the proceeding, is that the Commission has jurisdiction to approve or disapprove the application
2 under Washington law. Additionally, Integra believes the Commission should not approve the
3 application or should approve the application only with certain conditions that ensure that the
4 merger is in the public interest as it relates to the provision of communications services to the
5 citizens of the state of Washington.

6 5. Integra does not propose to broaden the issues in this proceeding. The
7 Commission has already framed the issues: "The ultimate issues include whether the
8 Commission has jurisdiction over the proposed transaction between Verizon Communications
9 Inc. and MCI, Inc., and if so, whether the proposed transaction complies with the above-
10 referenced statutes and is otherwise in the public interest." Integra's participation will be limited
11 to those issues.
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13 For the foregoing reasons, Integra respectfully requests that the Commission grant its
14 Petition to Intervene.

15 Dated this 16 day of June, 2005.

16 Respectfully submitted,

17 INTEGRA TELECOM OF WASHINGTON, INC.

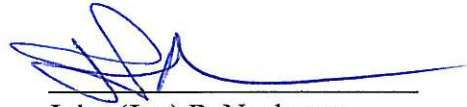
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19 By: 

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22 Portland, Oregon 97232
23 Direct Dial: 503-453-8054
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the persons and entities listed on the Service List below by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Portland, Oregon this 16 day of June, 2005



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