

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of)	
)	Docket No. UT-003013
Continued Costing and Pricing)	
of Unbundled Network Elements,)	Petition to Intervene
Transport and Termination)	

1. Name and address of petitioner.

Winstar Wireless, Inc.
Russell C. Merbeth
Michael Carowitz
Stephen Murray
1615 L Street, NW, Suite 1260
Washington, DC 20036

Phone Number (202) 367-7607

2. Name and address of the attorney, if any, representing the petitioner.

Paul B. Hudson
Swidler Berlin Shereff Berlin, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007
pbhudson@swidlaw.com

Phone Number (202) 945-6940

3. If the petitioner is an organization:

Petitioner is not an organization.

4. The petitioner has participated in several UTC cases in the last two years, including:

Docket No. UT-990873, Telecommunications Act Fee Rulemaking

Docket No. UT-000883, U S West Petition for Competitive Classification

Docket No. UT-990582, Telecommunications Collocation Rulemaking

Docket No. UT-990328, Petition of Winstar Wireless, Inc., for Approval of IntraLATA Presubscription Implementation Plan

Docket No. UT-970377, Request For Approval of Negotiated Agreement Under the Telecommunications Act of 1996 Between Winstar Wireless Incorporated and GTE Northwest Incorporated

Docket No. UT-003118, Request for Approval of Negotiated Agreement under the Telecommunications Act of 1996 Between Winstar Wireless, Inc., and United Telephone Company of the Northwest

5. The petitioner has the following interest in this proceeding:

Winstar is a competitive local exchange carrier that is building one of the world's largest broadband communications networks. Its high-capacity broadband network uses the 38 GHz, 28 GHz and other portions of the radio spectrum to reach customers directly in more than 45 markets nationwide. Although Winstar relies primarily upon its own facilities rather than unbundled network elements, Winstar utilizes microwave collocation in order to interconnect to the ILEC networks so that it may provide ubiquitous switched services. Therefore, Winstar has a substantial interest in ensuring that the rates, terms and conditions in Qwest's and Verizon's collocation tariffs are just and reasonable.

6. The petitioner will raise the following issues in this case:

Winstar will draw upon its experience with microwave collocation to present evidence to the Commission relating to the determination of appropriate rates, terms and conditions for Qwest's and Verizon's microwave collocation tariffs.

7. The petitioner may:

a. Submit written testimony and exhibits of the following people:

b. Call the following witnesses to testify:

c. Cross-examine the witness called by other parties.

d. Submit written arguments and/or motions.

After Qwest and Verizon file their proposed microwave collocation tariffs and supporting testimony, Petitioner will determine whether it will submit testimony, call witnesses, cross-examine witnesses, and/or file written arguments and/or motions.

8. I submit this Petition to Intervene and request authorization to participate in this proceeding.

Signature of Petitioner,
authorized representative of
petitioner, or attorney for
petitioner.

Date

District of Columbia

) ss.

I, _____, affirm that this petition is true and complete to the best of my knowledge and belief.

Signature of petitioner,
or attorney of petitioner.