

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

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

Pursuant to the proceedings in this docket at the prehearing conference held on February 15, 2001, Winstar Wireless, Inc. ("Winstar") files this supplement to its Petition to Intervene ("Petition") filed on February 12, 2001 in this docket, and provides the following additional information in support of its Petition:

1. Winstar acknowledges that its petition to intervene is late-filed. However, good cause exists to support grant of the petition in accordance with the rules of the Commission. WAC 480-09-430(1)(a). Winstar's primary interest in this proceeding is to ensure that the tariffs offered by Qwest and Verizon for microwave collocation are just and reasonable, for the reasons set forth in paragraph 5 of Winstar's Petition. The initial collocation proposals filed by Verizon and Qwest in this docket did not presume to establish standard rates for collocation of microwave facilities. It became certain that rates for microwave collocation would be addressed in this docket only at the issuance of the Thirteenth Supplemental Order in this docket, dated January 31, 2001. Winstar learned of that order shortly thereafter and began immediate preparations to seek intervention in this docket.
2. At this time, Winstar does not seek special intervention to broaden the issues in this proceeding.

3. Even if microwave collocation issues are segregated into a Part C in this proceeding, Winstar has an interest in participation in Part B. Winstar utilizes inside wiring obtained from incumbent carriers, and it therefore has a substantial interest in ensuring that the rates charged by Qwest and Verizon are just and reasonable. Because Winstar does not, prior to intervention, have access to the confidential ILEC cost studies in this docket that include cost calculations for inside wiring, Winstar is unable to evaluate whether the proposed rates are just and reasonable. Winstar therefore seeks party status, with all of the rights and privileges of other parties, for the purposes of Part B, Part C, and any subsequent proceedings in this docket.

4. With respect to microwave collocation issues, which Winstar understands will be addressed in Part C, Winstar seeks the right to submit written testimony and exhibits, call witnesses, cross-examine the witness called by other parties, and submit written arguments and/or motions. At this time, Winstar has not determined which witnesses it may call. In Part B, at this time, Winstar does not expect that it would file testimony or call witnesses, but may, if permitted, cross-examine the witness called by other parties and submit written arguments and/or motions. Winstar expects that it may be able to co-sponsor testimony, motions, and/or other filings to be made by Teligent Services, Inc., which is already a party to this proceeding. Therefore, Winstar does not expect that its participation will cause a substantial increase in the volume of testimony and motions to be filed in this docket. However, in order to protect its interests and the interests of its Washington

customers, and to ensure a more complete record in this case, Winstar seeks to intervene with all of the rights and privileges of other parties in this proceeding.

Respectfully submitted,

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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.