

1
2 **WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

3
4 **IN THE MATTER OF**

5 THE CONTINUED COSTING AND PRICING OF
6 UNBUNDLED NETWORK ELEMENTS AND TRANSPORT
7 AND TERMINATION

DOCKET No. UT-003013

PART B
PART C

**COMMENTS OF TELIGENT
SERVICES, INC.**

8
9
10 TELIGENT SERVICES, INC., ("Teligent") hereby submits its comments in support of
11 the Petition to Intervene of Winstar Wireless, Inc., ("Winstar") filed in the above-referenced
12 matter.¹ Specifically, Winstar requests intervention to ensure that the tariffs proposed by
13 Qwest and Verizon for microwave collocation are just and reasonable.² Because Winstar
14 utilizes microwave collocation as a means of interconnection, Winstar plainly has an interest in
15 determining the appropriate tariffed offerings for microwave collocation.³

16
17 The Commission's rules state that a late-filed petition for intervention may be granted
18 if good cause is shown.⁴ Below, Teligent offers a number of reasons why the Commission
19 should grant Winstar's petition. Teligent believes that Winstar can make a valuable
20

21
22 ¹ In the Matter of Continued Costing and Pricing of Unbundled Network Elements, Transport and
Termination, Petition to Intervene of Winstar Wireless, Inc., WUTC Docket No. UT-003013 (Part B), filed
February 12, 2001 (hereinafter "Petition").

23 ² In the Matter of Continued Costing and Pricing of Unbundled Network Elements, Transport and
Termination, Supplement to Petition to Intervene of Winstar Wireless, Inc., WUTC Docket No. UT-003013 (Part
24 B), filed February 12, 2001 (hereinafter "Supplement"), at 1.

25 ³ See Petition at 5 and Supplement at 3.

⁴ WAC 480-09-430(1)(a).

1
2 contribution to this proceeding by sharing its unique experiences with regard to microwave
3 collocation. Although Teligent can relate its experiences with microwave collocation tariffs,
4 Winstar's experience with microwave collocation may provide additional insight and
5 information critical to the development of standardized microwave collocation offerings.
6 Indeed, Winstar has had significant experience in developing such offerings in other
7 jurisdictions and Teligent believes that both the Commission and competitors would benefit
8 from this experience.
9

10
11 Teligent also agrees that Winstar's intervention would not result in any administrative
12 burden.⁵ As Winstar noted in its petition, a grant of intervention would not cause an increase
13 in the volume of evidence submitted and may result in consolidated filings, thereby creating a
14 cost-savings for parties with similar interests. Indeed, Teligent expects that it will co-sponsor
15 testimony and other pleadings as Winstar suggests. Thus, the Commission need not be
16 concerned that Winstar's participation will place addition burdens on the parties.
17

18 For the foregoing reasons, Teligent requests that the Commission grant Winstar's
19 Petition, thereby giving Winstar party status in the above-referenced proceeding.
20
21
22
23
24

25 ⁵ See Supplement at 2 and 4.

1
2 RESPECTFULLY SUBMITTED THIS 23RD DAY OF FEBRUARY 2001.

3 **TELIGENT SERVICES, INC.**

4
5 By: _____

6 LAURENCE E. HARRIS

7 TERRI B. NATOLI

8 VICTORIA A. SCHLESINGER

9 8065 LEESBURG PIKE, SUITE 400

10 VIENNA, VA 22182

11 (703) 762-5510

12
13
14
15
16
17
18
19
20
21
22
23
24
25

COMMENTS OF TELIGENT SERVICES,
INC. – PAGE 3

TELIGENT SERVICES, INC.
8065 LEESBURG PIKE, SUITE 400
VIENNA, VA 221827
(703) 762-5100

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25