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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Implementation of the  
Federal Communication Commission's  
Triennial Review Order

Docket No. UT-033025

PETITION TO INTERVENE OF  
THE NORTHWEST COMPETITIVE  
COMMUNICATIONS COALITION

The Northwest Competitive Communications Coalition ("Coalition"), respectfully  
petitions for intervention in this matter. In support of its petition, The Coalition states the  
following:

1. The Coalition brings this petition under WAC 480-09-430.
2. The Coalition will not, by its appearance and participation herein, broaden  
the issues beyond those stated in this case.

3. The Coalition's address is:

Andrew O. Isar  
Miller Isar, Inc.  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335  
Phone: 253.851.6700  
Facsimile: 253.851.6474  
E-mail: aisar@millerisar.com

PETITION TO INTERVENE OF  
COALITION.- 1  
SEADOCs:161581. 1

MILLER NASH LLP  
ATTORNEYS AND COUNSELORS AT LAW  
TELEPHONE (206) 622-8484  
4400 TWO UNION SQUARE  
601 UNION STREET, SEATTLE, WASHINGTON 98101-2352

1  
2 4. The name and address of The Coalition's attorneys are:

3 Brooks E. Harlow  
4 David L. Rice  
5 Miller Nash LLP  
6 4400 Two Union Square  
7 601 Union Street  
8 Seattle, Washington 98101  
9 Phone: (206) 622-8484  
10 Facsimile: (206) 622-7485  
11 E-mail: brooks.harlow@millernash.com  
12 david.rice@millernash.com

13 5. The Coalition is a non-profit corporation incorporated in Washington. Its  
14 voting membership is open to any non-incumbent company that provides or intends to provide in  
15 the future competitive telecommunications services in the States of Washington, Oregon, or  
16 Idaho. Its current members are: ATL Communications; Axxis Communications Gorge  
17 Networks, Inc.; Fox Communications Corporation; Focal Communications Corporation of  
18 Washington; Eschelon Telecom of Washington, Inc.; Oregon Telecom; sentitO Networks; World  
19 Communications, Inc.; and Z-Tel.

20 6. The Coalition has a substantial interest in this proceeding. Its members  
21 currently purchase UNEs from Qwest and Verizon (and other ILECs as well) to serve their  
22 customers in Washington. The Coalition must participate in this docket to help ensure that they  
23 can obtain access to necessary UNEs in accordance with federal law and, to the extent not  
24 preempted, under applicable state law.

25 7. The Coalition's participation and positions will be determined as the  
26 issues are more fully developed in this docket. Some, but not certainly not all, of the Coalition's  
member companies may participate in this docket in their individual capacities. To the extent  
that occurs, the Coalition will coordinate to ensure that there is no undue duplication of  
participation by the coalition and such members.

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

DATED this 25th day of September, 2003.

MILLER NASH LLP



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Brooks E. Harlow  
WSB No. 11843  
David L. Rice  
WSB No.

Attorneys for Intervenor  
Northwest Competitive Communications  
Coalition