

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of Frontier Communications)	DOCKET NO. UT-121994
Northwest Inc.'s Petition to be Regulated as a)	
Competitive Telecommunications Company)	LEVEL 3 PETITION TO INTERVENE
Pursuant to RCW 80.36.320.)	
)	
)	

1. Pursuant to WAC 480-07-355, Level 3 Communications, LLC (“Level 3”) hereby petitions the Commission for leave to intervene in this docket. As grounds for intervention, Level 3 states as follows:

I.

2. The name, address, and telephone number of the person to whom communications should be addressed are:

Gregory T. Diamond
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Level 3 Communications, LLC
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II.

3. Level 3 is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Washington. Level 3 currently competes with, and obtains interconnection and related services and facilities from Frontier Communications Northwest Inc. (“Frontier”) in the provision of Level 3’s telecommunications services.

III.

4. Level 3 has a substantial interest in the proposed petition of Frontier seeking classification as a competitive telecommunications company. Frontier is the second largest incumbent local exchange carrier (“ILEC”) in Washington with 102 wire centers, including, but not limited to, population centers in parts of King County, significant areas north of King County, the Spokane area and the Vancouver area. Level 3 relies on interconnection with, and related services and facilities obtained from Frontier to offer and provide service to its customers in Frontier’s service territory. Level 3 seeks to participate in this proceeding to ensure that the proposed petition will not adversely impact competition in Washington or Level 3’s rights and ability to obtain the interconnection and related services and facilities from Frontier that Level 3 needs to provide its telecommunications services. Because Frontier seeks competitive classification under RCW 80.36.320, it is seeking competitive classification for all the services and facilities it provides to its customers, including wholesale and retail services and facilities, rather than service-by-service relief identified under RCW 80.36.330. As such, the petition, if granted, may have a greater impact on competition and the availability of services and facilities from Frontier in Washington.

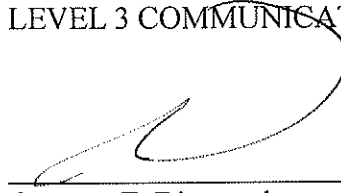
IV.

5. The evidence, if any, and briefing presented by Level 3 will be of material value to the Commission in its determination of the issues involved in this proceeding, and Level 3’s intervention will not broaden those issues or delay the proceedings.

WHEREFORE, Level 3 prays for leave to intervene as a party to this proceeding, with a right to discovery, to have notice of and appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on brief and at oral argument.

RESPECTFULLY SUBMITTED this 6th day of February 2013.

LEVEL 3 COMMUNICATIONS, LLC



Gregory T. Diamond
WSBA No. 28025

Attorney for Level 3 Communications, LLC