April 18, 2000

Arizona Corporation Commission  
Docket Control – Utilities Division  
1200 W. Washington Street  
Phoenix, AZ 85007  

Re: In the Matter of Investigation into US WEST Communications, Inc.’s Compliance with Certain Wholesale Pricing Requirements for Unbundled Network Elements and Resale Discounts, Docket No. T-00000A-00-0194

Dear Docket Control:

Enclosed for filing in the above named docket are the original and 10 copies of Motion by NEXTLINK, Inc. for Late-Filed Intervention.

Should you have any questions regarding this filing please call Robert Tanner at (602) 787-2905.

Very truly yours,

Davis Wright Tremaine LLP

Larry J. Weathers  
Paralegal

Enclosures

cc: Robert Tanner  
Greg Kopta  
Mary Steele
BEFORE THE
ARIZONA CORPORATION COMMISSION

IN THE MATTER OF INVESTIGATION INTO ) DOCKET NO. T-00000A-00-0194
U S WEST COMMUNICATIONS, INC.'S ) MOTION BY NEXTLINK, INC.
COMPLIANCE WITH CERTAIN WHOLESALE ) FOR LATE-FILED
PRICING REQUIREMENTS FOR UNBUNDLED ) INTERVENTION
NETWORK ELEMENTS AND RESALE )
DISCOUNTS )

MOTION BY NEXTLINK, INC. TO PERMIT
LATE-FILED INTERVENTION

NEXTLINK, INC. respectfully petitions the Arizona Corporation Commission
(“Commission”) for leave to intervene in the above-captioned proceeding. NEXTLINK’s
original application to intervene is attached hereto as Exhibit A. This application was mailed
before the deadline to intervene but did not reach the Commission because of an incorrect
address on the mailing label. NEXTLINK filed this motion for late-filed intervention
immediately upon learning of the error. All parties were served with Exhibit A on a timely basis
and none of the parties, therefore, will be prejudiced if NEXTLINK is permitted to intervene at
this time.

WHEREFORE, NEXTLINK respectfully requests leave to intervene as a party to this
proceeding with a right to discovery, to have notice 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 18th day of April, 2000.

[Signature]

Robert S. Tanner
Davis Wright Tremaine LLP
17203 N. 42nd Street
Phoenix, AZ 85032
Tel. (602) 787-2905
Fax (602) 788-8944
EXHIBIT A
COVER SHEET
ARIZONA CORPORATION COMMISSION
DOCKET CONTROL CENTER

CASE/COMPANY NAME: NEXTLINK Arizona, Inc.

D/B/A or RESPONDENT:

DOCKET NO. T-00000A-00-0194

IN THE MATTER OF INVESTIGATION INTO
U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH
CERTAIN WHOLESALE PRICING REQUIREMENTS FOR
UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS

NATURE OF ACTION OR DESCRIPTION OF DOCUMENT
Please mark the item that describes the nature of the case/filing:

01 UTILITIES - NEW APPLICATIONS

NEW CC&N
RATES
INTERIM RATES
CANCELLATION OF CC&N
DELETION OF CC&N (TERRITORY)
EXTENSION OF CC&N (TERRITORY)
TARIFF - NEW (NEXT OPEN MEETING)
REQUEST FOR ARBITRATION
(Telecommunication Act)
FULLY OR PARTIALLY ARBITRATED
INTERCONNECTION AGREEMENT
(Telecom. Act.)
VOLUNTARY INTERCONNECTION
AGREEMENT (Telecom. Act)

02 UTILITIES - REVISIONS/AMENDMENTS TO
PENDING OR APPROVED MATTERS

APPLICATION
COMPANY
DOCKET NO.

TARIFF
PROMOTIONAL
DECISION NO.
DOCKET NO.

SECURITIES or MISCELLANEOUS FILINGS

AFFIDAVIT
EXCEPTIONS
REQUEST FOR INTERVENTION
REQUEST FOR HEARING
OPPOSITION
COMPLIANCE ITEM FOR APPROVAL
TESTIMONY
COMMENTS

29 STIPULATION
29 NOTICE OF INTENT
(Only notification of future action/no action necessary)
38 PETITION
46 NOTICE OF LIMITED APPEARANCE
43 OTHER
39 Specify

April 13, 2000
Date

ROBERT TANNER
Print Name of Applicant/Company/Contact person/Respondent/Attty.
(602) 787-2905
Phone

PLEASE SEE NOTICE ON REVERSE SIDE

(Revision date 4/23/98)
April 13, 2000

Arizona Corporation Commission
Docket Control – Utilities Division
1200 W. Washington Street
Phoenix, AZ 85007

Re: In the Matter of Investigation into U S WEST Communications, Inc.’s Compliance with Certain Wholesale Pricing Requirements for Unbundled Network Elements and Resale Discounts, Docket No. T-00000A-00-0194

Dear Docket Control:

Enclosed for filing in the above named docket are the original and 10 copies of NEXTLINK Arizona, Inc.’s Application to Intervene.

Should you have any questions regarding this filing please call Robert Tanner at (602) 787-2905.

Very truly yours,

Davis Wright Tremaine LLP

Enclosures

cc: Greg Kopta
IN THE MATTER OF INVESTIGATION INTO ) DOCKET NO. T-00000A-00-0194
U S WEST COMMUNICATIONS, INC.'S ) APPLICATION TO INTERVENE
COMPLIANCE WITH CERTAIN WHOLESALE )
PRICING REQUIREMENTS FOR UNBUNDLED )
NETWORK ELEMENTS AND RESALE )
DISCOUNTS )

NEXTLINK ARIZONA, INC.'S
APPLICATION TO INTERVENE

Pursuant to Rule R14-3-105 of the Arizona Administrative Code, NEXTLINK Arizona, Inc., ("NEXTLINK") respectfully petitions the Arizona Corporation Commission ("Commission") for leave to intervene in the above-captioned proceeding and hereby give notice of its intention to participate as a full party to this proceeding.

The names, addresses and telephone numbers of the persons to whom communications should be addressed for the Applicant are:

Rex M. Knowles
NEXTLINK Arizona, Inc.
111 E. Broadway
Suite 1000
Salt Lake City, UT 84111
Tel: (801) 983-1504
Fax: (801) 983-1667
Email: rknowles@nextlink.com

Greg Kopta
DAVIS WRIGHT TREMAINE LLP
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688
Tel: 206.628.7692
Fax: 206.628.7699
Email: gregkopta@dwt.com

Robert S. Tanner
DAVIS WRIGHT TREMAINE LLP
17203 N. 42nd Street
Phoenix, AZ 85032
Tel: 602.787.2905
Fax: 602.788.8944
Email: robbtanner@dwt.com
I. INTRODUCTION

On January 28, 2000, the Arizona Corporation Commission ("Commission") staff filed a Motion to Reopen Docket or Open a New Sub-Docket. On March 30, 2000, the Commission issued a Procedural Order opening new Docket No. T-00000A-00-0194 and setting forth a procedural schedule for Phase I of the docket.

II. IDENTITY OF APPLICANT

NEXTLINK has an Application for a Certificate to Compete as a Telecommunications Corporation and to Offer Public Telecommunications Services authorizing NEXTLINK to provide local telecommunications services in Arizona in exchanges in which USWC is the incumbent local exchange carrier ("ILEC"). NEXTLINK offers local and interexchange services to customers in Arizona in competition with USWC.

III. INTEREST OF APPLICANTS

NEXTLINK has a direct and substantial interest in this proceeding because it obtains critical facilities and services from USWC and interconnects with USWC's network in order to compete with USWC in the provision of local, interexchange and advanced services. USWC continues to be the monopoly, incumbent local exchange carrier serving the majority of customers throughout its service territory in Arizona. NEXTLINK thus has a substantial interest in ensuring that the rates for USWC's wholesale services, including network elements and the discount for resale of USWC's retail services are in compliance with the federal Communications Act and Arizona law. Accordingly, NEXTLINK will be directly impacted by the rates set by the Commission in this docket.
IV. NATURE OF INTERVENTION

The participation of NEXTLINK will be of material value to the Commission in its determination of the issues involved in this proceeding, and a grant of intervention to NEXTLINK will not broaden those issues or delay the proceedings.

WHEREFORE, NEXTLINK respectfully requests 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.


[Signature]

Robert S. Tanner
Davis Wright Tremaine LLP
17203 N. 42nd Street
Phoenix AZ 85032
Tel. (602) 787-2905
Fax (602) 788-8944
CERTIFICATE OF SERVICE
Docket No. T-00000A-00-0194

I hereby certify that the original and 10 copies of NEXTLINK Arizona, Inc.'s Application to Intervene were filed this 13th day of April, 2000, via FedEx overnight delivery to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 W. Washington Street
Phoenix, AZ 85007

and one copy each of the foregoing was mailed via First Class postage to:

AT&T
Richard S. Wolters
AT&T Communications, Inc.
1875 Lawrence Street, Room 1575
Denver, CO 80207-1847

USWC
Thomas Dethlefs
U S WEST Communications, Inc.
1801 California Street, Suite 5100
Denver, CO 80202

Cox/ESPIRE
Michael W. Patten
Brown & Bain
P.O. Box 400
Phoenix, AZ 85001-0400

ELI/Covad/New Edge
Michael Grant
Gallagher & Kennedy
2575 E. Camelback Road
Phoenix, AZ 85016-9225

Rhythms Links
Thomas H. Campbell
Lewis & Roca
40 N. Central Avenue
Phoenix, AZ 85007
MCI WorldCom
Thomas F. Dixon, Jr.
MCI WorldCom
707 17th Street
Denver, CO 80202

Sprint
Darren S. Weingard
Stephen H. Kukta
Sprint Communications Co.
1850 Gateway Drive, 7th Floor
San Mateo, CA 94404-2467

RU CO
Scott S. Wakefield
Residential Utility Consumer Office
2828 N. Central Avenue, Suite 1200
Phoenix, AZ 85004

NEXTLINK
Rex M. Knowles
NEXTLINK Arizona, Inc.
111 E. Broadway, Suite 1000
Salt Lake City, UT 84111

ATG
Kathy Thomas
Advance TelCom Group, Inc.
100 Stoney Point Rd.
Suite 130
Santa Rosa, CA 95401

ACC
Lyn Farmer, Chief Counsel
ACC - Legal Division
1200 W. Washington Street
Phoenix, AZ 85007
ACC
Deborah Scott, Director
ACC - Utilities Division
1200 W. Washington Street
Phoenix, AZ 85007

Arizona Reporting Service
2627 N. Third Street, Suite Three
Phoenix, AZ 85004-1103

Dated this April 13, 2000 by [Signature]
I hereby certify that the original and 10 copies of Motion by NEXTLINK, Inc. to Permit Late-Filed Intervention was filed this 18th day of April, 2000, via FedEx overnight delivery to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 W. Washington Street
Phoenix, AZ 85007

and one copy each of the foregoing was mailed via First Class postage to:

AT&T
Richard S. Wolters
AT&T Communications, Inc.
1875 Lawrence Street, Room 1575
Denver, CO 80207-1847

USWC
Thomas Dethlefs
U S WEST Communications, Inc.
1801 California Street, Suite 5100
Denver, CO 80202

Cox/e.spire
Michael W. Patten
Brown & Bain
P.O. Box 400
Phoenix, AZ 85001-0400

ELI/Covad/New Edge
Michael Grant
Gallagher & Kennedy
2575 E. Camelback Road
Phoenix, AZ 85016-9225

Rhythms Links
Thomas H. Campbell
Lewis & Roca
40 N. Central Avenue
Phoenix, AZ 85007
MCI WorldCom
Thomas F. Dixon, Jr.
MCI WorldCom
707 17th Street
Denver, CO 80202

Sprint
Darren S. Weingard
Stephen H. Kukta
Sprint Communications Co.
1850 Gateway Drive, 7th Floor
San Mateo, CA 94404-2467

RUCO
Scott S. Wakefield
Residential Utility Consumer Office
2828 N. Central Avenue, Suite 1200
Phoenix, AZ 85004

NEXTLINK
Rex M. Knowles
NEXTLINK Arizona, Inc.
111 E. Broadway, Suite 1000
Salt Lake City, UT 84111

ATG
Kathy Thomas
Advance TelCom Group, Inc.
100 Stoney Point Rd.
Suite 130
Santa Rosa, CA 95401

ACC
Lyn Farmer, Chief Counsel
ACC - Legal Division
1200 W. Washington Street
Phoenix, AZ 85007

ACC
Deborah Scott, Director
ACC - Utilities Division
1200 W. Washington Street
Phoenix, AZ 85007

Dated this April 13, 2000
by Larry F. Weatherby