INTERVENTION

April 15, 2003

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Re: MOTION TO INTERVENE

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

Docket No. T-01051B-02-0871, Arizona Corporation Commission, Complainant v. Qwest Corporation, Respondent

Dear Corporation Commissioners and Staff:

Enclosed please find an original and 13 copies of a Motion to Intervene from Electric Lightwave, L.L.C. in the above-captioned dockets

Sincerely,

Charles Best, Esq.
Associate General Counsel
BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER, Chairman
JIM IRVIN, Commissioner
WILLIAM MUNDELL, Commissioner
JEFF HATCH-MILLER, Commissioner
MIKE GLEASON, Commissioner

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

ARIZONA CORPORATION COMMISSION, Complainant,

v.

QWEST CORPORATION, Respondent.

Docket No. T-00000A-00-0194
Docket No. T-01051B-02-0871

MOTION TO INTERVENE

Electric Lightwave, L.L.C. ("Electric Lightwave") hereby moves the Arizona Corporation Commission ("Commission") pursuant to A.A.C. R14-3-105, to grant Electric Lightwave leave to intervene in the above-captioned proceeding. In support hereof, Electric Lightwave states as follows:

1. Electric Lightwave is a public service corporation under the jurisdiction of the Commission and provides telecommunication service to the State of Arizona.
2. On January 16, 2003, Mountain Telecommunications, Inc. ("MTI") filed a Motion for an Injunction with the Commission to enjoin Qwest Corporation ("Qwest") from charging unjust and unreasonable charges for transport facilities.

3. On February 21, 2003, Time Warner Telecom of Arizona ("TWA") filed Comments on the issues raised by MTI and requested an expedited hearing in Phase III or modification of Decision No. 64922.

4. On March 7, 2003, Staff filed a response to the motions of MTI and TWA recommending that the Commission reopen the record of Phase II to address the issue raised by MTI and TWA.

5. Electric Lightwave is directly and substantially affected by the possible revision of the Commission's Phase II Order.

6. Electric Lightwave's participation in the above-captioned proceeding will not unduly broaden the nature or scope of this proceeding. Electric Lightwave, like the Staff, believes that application of the combined transport and entrance facility rate of which MTI and TWA complain is producing "...an unexpected and unreasonable rate increase...which was not intended by the Phase II Order." Service of all correspondence, documents or pleadings should be made to counsel for Citizens as follows:

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With a copy to:

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WHEREFORE, for all of the foregoing reasons, Electric Lightwave respectfully requests that the Commission issue its order granting this Motion to Intervene.

RESPECTFULLY SUBMITTED this 15th day of April, 2003.

By

Charles Best, Esq.
Associate General Counsel
Electric Lightwave, L.L.C.
CERTIFICATE OF SERVICE

Original and thirteen (13) copies of the foregoing filed by certified mail this 15th day of April, 2003, with the:

Arizona Corporation Commission
Docket Control Center
1200 West Washington Street
Phoenix, Arizona 85007-2996

Copies of the foregoing mailed this 15th day of April, 2003, to:

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