



# INTERVENTION

# ORIGINAL

Arizona Corporation Commission

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BEFORE THE ARIZONA CORPORATION COMMISSION

SEP 29 2000

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CARL J. KUNASEK  
Chairman  
JAMES M. IRVIN  
Commissioner  
WILLIAM MUNDELL  
Commissioner



AZ CORP COMMISSION  
DOCUMENT CONTROL

T-03824A-99-0749

IN THE MATTER OF THE APPLICATION OF NETWORKIP, LLC FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY TO PROVIDE COMPETITIVE INTRASTATE TELECOMMUNICATIONS SERVICES AS A RESELLER EXCEPT LOCAL EXCHANGE SERVICES.

DOCKET NO. T-03768A-99-0443

MOTION FOR LEAVE TO INTERVENE

Pursuant to Rule 14-3-105, Arizona Administrative Code, Qwest Corporation ("Qwest"), formerly U S WEST Communications, Inc., applies to this Commission for an order granting leave to intervene in the above-captioned proceeding.

The Commission should grant Qwest leave to intervene in this matter because Qwest is directly and substantially affected by these proceedings. NetworkIP, LLC ("NetworkIP") is seeking a Certificate of Convenience and Necessity to provide competitive intrastate telecommunications services as a reseller. As a result, NetworkIP will, in all likelihood, purchase services from Qwest if the Certificate is granted. Under these circumstances, Qwest has a substantial and direct interest in the outcome of NetworkIP's application. Furthermore, Qwest has an interest in observing the process by which the Commission will conduct a fair value rate base determination for NetworkIP.

Finally, Qwest's participation in the proceeding will not unduly broaden the issues raised. The name, address and telephone

1 number of the person upon whom service of all documents is to be  
2 made is:

3 Timothy Berg  
4 FENNEMORE CRAIG, P.C.  
5 3003 North Central Avenue  
6 Suite 2600  
7 Phoenix, Arizona 85012  
8 (602) 916-5421

9 RESPECTFULLY SUBMITTED this 29th day of September, 2000.

10 QWEST CORPORATION  
11 Thomas Dethlefs

12 and

13 FENNEMORE CRAIG, P.C.

14 By *Jeff Anliville*  
15 Timothy Berg  
16 Theresa Dwyer  
17 3003 North Central Avenue, Suite 2600  
18 Phoenix, Arizona 85012  
19 (602) 916-5421  
20 Attorneys for  
21 Qwest Corporation

22 ORIGINAL and 10 copies of the  
23 foregoing hand-delivered for  
24 filing this 29th day of  
25 September, 2000, to:

26 Docket Control  
ARIZONA CORPORATION COMMISSION  
1200 West Washington  
Phoenix, Arizona 85007

COPY of the foregoing hand-delivered  
this 29th day of September, 2000, to:

Lyn Farmer, Chief Counsel  
ARIZONA CORPORATION COMMISSION  
Legal Division  
1200 West Washington  
Phoenix, Arizona 85007

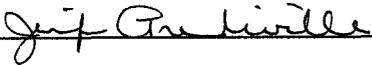
1 Deborah Scott  
Director, Utilities Division  
2 ARIZONA CORPORATION COMMISSION  
1200 West Washington  
3 Phoenix, Arizona 85007

4 Alicia Grantham, Administrative Law Judge  
Hearing Division  
5 ARIZONA CORPORATION COMMISSION  
1200 West Washington  
6 Phoenix, Arizona 85007

7 COPY of the foregoing mailed this  
29th day of September, 2000 to:

8  
9 Tony Van Burkleo  
NETWORKIP, LLC  
119 West Tyler Street, Suite 168  
10 Longview, Texas 75601

11 Lance J.M. Steinhart  
6455 East Johns Crossing, Suite 285  
12 Duluth, Georgia 30097

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