



RECEIVED
BEFORE THE ARIZONA CORPORATION COMMISSION
Arizona Corporation Commission

2000 JUN 13 P 4: 16

DOCKETED

JUN 13 2000

CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY [Signature]

IN THE MATTER OF US WEST) DOCKET NO. T-00000B-97-0238
COMMUNICATIONS, INC.'S COMPLIANCE)
WITH § 271 OF THE TELECOMMUNICATIONS) ICG COMMUNICATION, INC.'S
ACT OF 1996.) MOTION TO INTERVENE
)

ICG Communications, Inc. ("ICG"), pursuant to A.A.C. R14-3-105, hereby moves to intervene in the above-captioned proceeding. In support hereof, ICG states as follows:

1. ICG holds a certificate of convenience and necessity to provide competitive telecommunications services in Arizona. As such, ICG is a competitor of US West. It must also interconnect with US West and may, from time to time, purchase unbundled network elements from US West.

2. ICG has recently entered into an interconnection agreement with US West, and is in the process of negotiating an interconnection agreement which will govern the parties' relationship once the first agreement expires.

3. ICG seeks to participate in these proceedings because the issues being resolved here will have a bearing on the relationship between ICG and US West, the terms of the interconnection agreement between ICG and US West, the price of services ICG must purchase from US West, and certain charges which ICG may assess against US West. ICG seeks to participate to ensure US West's compliance with State and Federal requirements.

ROSHKA HEYMAN & DEWULF, PLC
TWO ARIZONA CENTER
400 NORTH 5TH STREET - SUITE 1000
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 4. ICG's participation in this proceeding will not unduly broaden the nature or scope
2 of this proceeding.

3 5. No other party or intervenor can represent the interests of ICG.

4 6. Service of all correspondence, documents or pleadings should be made to counsel
5 for the ICG as follows:

6 Raymond S. Heyman, Esq.
7 Randall H. Warner, Esq.
8 Roshka Heyman & DeWulf
9 Two Arizona Center
10 400 N. Fifth Street, Suite 1000
11 Phoenix, Arizona 85004

12 7. ICG recognizes that these proceedings have been ongoing for some time. Because
13 ICG only recently entered into an interconnection agreement with US West, the need for its
14 participation in this proceeding has just become apparent.

15 WHEREFORE, for the foregoing reasons, ICG Communications, Inc. respectfully requests
16 that the Commission issue its order granting this Motion to Intervene.

17 RESPECTFULLY SUBMITTED this 12th day of June, 2000.

18 ROSHKA HEYMAN & DEWULF, PLC

19 By 

20 Raymond S. Heyman
21 Randall H. Warner
22 Two Arizona Center
23 400 North 5th Street, Suite 1000
 Phoenix, Arizona 85004-3906

 Attorneys for ICG Communications, Inc.

1 **Original and ten copies of the foregoing**
2 **filed this 13th day of June, 2000, with:**

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 **Copy of the foregoing hand-delivered**
8 **this 13th day of June, 2000, to:**

9 Jerry L. Rudibaugh, Chief Hearing Officer
10 Hearing Division
11 Arizona Corporation Commission
12 1200 West Washington Street
13 Phoenix, Arizona 85007

14 Lyn Farmer, Chief Counsel
15 Legal Division
16 Arizona Corporation Commission
17 1200 West Washington Street
18 Phoenix, Arizona 85007

19 Deborah Scott, Director
20 Utilities Division
21 Arizona Corporation Commission
22 1200 West Washington Street
23 Phoenix, Arizona 85007

24 **Copies of the foregoing sent via U.S. Mail**
25 **this 13th day of June, 2000, to:**

26 Michael M. Grant, Esq.
27 Gallagher & Kennedy
28 2600 N. Central Avenue
29 Phoenix, Arizona 85004-3020

30 Kathy Thomas
31 Brooks Fiber Communications
32 1600 S. Amphlett Blvd., Suite 330
33 San Mateo, California 94402

ROSHKA HEYMAN & DEWULF, PLC

TWO ARIZONA CENTER
400 NORTH 5TH STREET - SUITE 1000
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

- 1 Douglas G. Bonner, Esq.
Alexandre B. Bouton, Esq.
- 2 Swidler & Berling, Chartered
3000 K Street, N.W., Suite 300
3 Washington, D.C. 20007
- 4 Michael Patten, Esq.
Brown & Bain, P.A.
2901 N. Central Avenue
5 P.O. Box 400
Phoenix, Arizona 85001-0400
- 6 Carrington Phillip
7 Cox Communications, Inc.
1400 Lake Hearn Drive, N.E.
8 Atlanta, Georgia 30319
- 9 Joe Faber
Teleport Communications Group, Inc.
1350 Treat Blvd., Suite 500
10 Walnut Creek, California 94506
- 11 Penny Bewick
Electric Lightwave, Inc.
12 4400 N.E. 77th Avenue
Vancouver, Washington 98662
- 13 Thomas I. Mumaw, Esq.
Snell & Wilmer
14 400 E. Van Buren Street
Phoenix, Arizona 85004-0001
- 15 Robert Munoz
16 WorldCom, Inc.
225 Bush Street, 19th Floor
17 San Francisco, California 94104-4207
- 18 Donald A. Low
Sprint Communication Company, L.P.
19 8140 Ward Parkway, S.E.
Kansas City, Missouri 64114
- 20 Charles Kallenbach
American Communications Services, Inc.
21 131 National Business Parkway
Annapolis Junction, Maryland 20701
- 22
- 23

ROSHKA HEYMAN & DEWULF, PLC

TWO ARIZONA CENTER
400 NORTH 5TH STREET - SUITE 1000
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

- 1 Richard Smith
Director of Regulatory Affairs
2 Cox Communications
2200 Powell Street, Suite 795
3 Emeryville, California 94608
- 4 Thomas Campbell, Esq.
Lewis and Roca, L.L.P.
40 N. Central Avenue
5 Phoenix, Arizona 85004-4429
- 6 Karen L. Clausen
Thomas F. Dixon
7 MCI Telecommunications Corporation
707 - 17th Street, Suite 3900
8 Denver, Colorado 80202
- 9 Bill Haas
Richard Lipman
McLeod USA
10 6400 C Street, S.W.
Cedar Rapids, Iowa 54206-3177
- 11 Mary Tribby
12 Law and Government Affairs
AT&T
13 1875 Lawrence Street, Suite 1575
Denver, Colorado 80202
- 14 Joyce Hundley
U.S. Department of Justice Antitrust Division
15 1401 H Street, N.W., Suite 8000
Washington, D.C. 20530
- 16 Joan S. Burke, Esq.
17 Osborn Maledon, P.A.
2929 N. Central Avenue, Suite 2100
18 P.O. Box 36379
Phoenix, Arizona 85067-6379
- 19 Craig Marks, Esq.
Citizens Utilities Company
20 2901 N. Central Avenue, Suite 1660
Phoenix, Arizona 85012
- 21
- 22 
icg/pl/motion to intervene 271
- 23