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INTERVENTION

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BEFORE THE ARIZONA CORPORATION COMMISSION AZ CORP COMMISSION

JIM IRVIN
Commissioner - Chairman
TONY WEST
Commissioner
CARL J. KUNASEK
Commissioner

MAR 17 10 48 AM '99

DOCUMENT CANZOR Corporation Commission
DOCKETED

MAR 17 1999

IN THE MATTER OF THE APPLICATION OF US)
WEST COMMUNICATIONS, INC., A)
COLORADO CORPORATION, FOR A HEARING)
TO DETERMINE THE EARNINGS OF THE)
COMPANY, THE FAIR VALUE OF THE)
COMPANY FOR RATEMAKING PURPOSES, TO)
FIX A JUST AND REASONABLE RATE OF)
RETURN THEREON AND TO APPROVE RATE)
SCHEDULES DESIGNED TO DEVELOP SUCH)
RETURN.)

DOCKETED BY **Jr**
DOCKET NO. T-01051B-99-0105

**ARIZONA PAYPHONE
ASSOCIATION'S MOTION TO
INTERVENE**

The Arizona Payphone Association ("APA"), pursuant to A.A.C. R14-3-105 hereby moves to intervene in the above-captioned proceeding. In support hereof, APA states as follows:

1. APA's members represent over 5,000 independently owned telephones in Arizona. APA's members purchase or receive telecommunications services from US West.
2. APA's members also compete with US West to the extent it (or its affiliates or subsidiaries) maintains pay telephones in Arizona.
3. The rates US West charges and the increases it seeks in these proceedings have a direct economic impact on APA's members. APA seeks to intervene to ensure that the rates fixed for US West service are just and reasonable, and consistent with Arizona law and federal law.
4. APA's participation in this proceeding will not unduly broaden the nature or scope of this proceeding.
5. No other party or intervenor can represent the interests of APA's members as adequately and specifically as APA.

1 6. Service of all correspondence, documents or pleadings should be made to counsel
2 for the APA as follows:

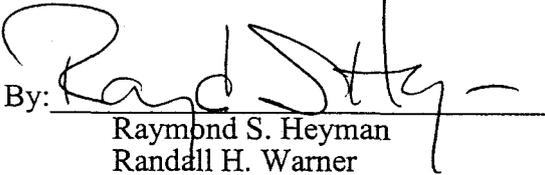
3 Raymond S. Heyman, Esq.
4 Randall H. Warner, Esq.
5 Roshka Heyman & DeWulf
6 Two Arizona Center
7 400 N. Fifth Street, Suite 1000
8 Phoenix, Arizona 85004

9 WHEREFORE, for all of the foregoing reasons, the Arizona Payphone Association
10 respectfully requests that the Commission issue its order granting this Motion to Intervene.

11 RESPECTFULLY SUBMITTED this 16th day of March, 1999.

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

12 ROSHKA HEYMAN & DEWULF, PLC

13 By: 

14 Raymond S. Heyman
15 Randall H. Warner
16 Two Arizona Center
17 400 North 5th Street, Suite 1000
18 Phoenix, Arizona 85004

19 Attorneys Arizona Payphone Association

1 **Original and ten copies of the foregoing**
2 **filed this 16th day of March, 1999, 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 16th day of March, 1999, to:**

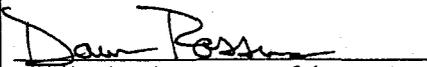
9 Jerry L. Rudibaugh, Chief Hearing Officer
10 Hearing Division
11 Arizona Corporation Commission
12 1200 West Washington Street
13 Phoenix, Arizona 85007

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

19 Ray Williamson, Acting 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**
this 16th day of March, 1999, to:

Timothy Berg, Esq.
Fennemore Craig, P.C.
3003 N. Central Avenue, Suite 2600
Phoenix, Arizona 85012-2913

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21 [apa/pl/motiontointerveneuswest2.doc](#)