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INTERVENTION

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

COMMISSIONERS

KRISTIN K. MAYES, Chairman  
GARY PIERCE  
PAUL NEWMAN  
SANDRA D. KENNEDY  
BOB STUMP

RE: Bandwidth.com CLEC, LLC TARIFF NO. 2

Docket Nos. ~~T-20562A-09-0480~~  
T-20562A-07-0615

**MOTION TO INTERVENE**

Pursuant to A.A.C. R14-3-105, AT&T Communications of the Mountain States, Inc. and its affiliates operating in Arizona (collectively referred to as "AT&T") request leave to intervene in this proceeding. In support of its request, AT&T states:

1. AT&T provides long distance service, both intraLATA and interLATA, in Arizona and throughout the United States. As a long distance provider, it pays compensation to incumbent local exchange carriers ("ILECs") and competitive local exchange carriers ("CLECs") for originating and terminating long distance calls.

2. In this proceeding, Bandwidth.com CLEC, LLC ("Bandwidth"), as a CLEC, has filed its Intrastate Access Services Tariff, Arizona C.C. Tariff No. 2 ("Proposed Tariff") which will impact the access charges assessed to AT&T and other long distance service providers. AT&T will be financially impacted by the Proposed Tariff and, as well, has substantial concerns with the ambiguity of, and other issues concerning, the Proposed Tariff as more fully discussed in AT&T's Motion to Suspend/Reject filed simultaneously herewith.

3. No other party can adequately represent the interests of AT&T in this docket. Its participation will not unduly broaden the issues presented.

GALLAGHER & KENNEDY, P.A.  
2575 E. CAMELBACK ROAD  
PHOENIX, ARIZONA 85016-9225  
(602) 530-8000



1 **Copies** of the foregoing delivered  
2 this 2<sup>nd</sup> day of November, 2009, to:

3 Maureen Scott  
4 Legal Division  
5 Arizona Corporation Commission  
6 1200 West Washington Street  
7 Phoenix, Arizona 85007

8 Terri Ford  
9 Utilities Division  
10 Arizona Corporation Commission  
11 1200 West Washington Street  
12 Phoenix, Arizona 85007

13 Candrea Allen  
14 Utilities Division  
15 Arizona Corporation Commission  
16 1200 West Washington Street  
17 Phoenix, Arizona 85007

18 John Bostwick  
19 Utilities Division  
20 Arizona Corporation Commission  
21 1200 West Washington Street  
22 Phoenix, Arizona 85007

23 **Copy** of the foregoing mailed this  
24 2<sup>nd</sup> day of November, 2009, to:

Candice Clark  
CABSagent  
4131 Spicewood Springs Road, Suite A-8  
Austin, Texas 78759

  
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