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# INTERVENTION

ONA CORPORATION COMMISSION

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AZ CORP COMMISSION  
DOCUMENT CONTROL

WILLIAM A. MUNDELL  
 Chairman Arizona Corporation Commission  
 JAMES R. IRVIN DOCKETED  
 Commissioner  
 MARC SPITZER APR 17 2002  
 Commissioner

DOCKETED BY	<i>[Signature]</i>
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IN THE MATTER OF QWEST  
 CORPORATION'S COMPLIANCE WITH  
 SECTION 252(e) OF THE  
 TELECOMMUNICATIONS ACT OF 1996

)  
 ) Docket No. RT-00000F-02-0271  
 )  
 ) APPLICATION OF TCG  
 ) PHOENIX FOR LEAVE TO  
 ) INTERVENE  
 )

In accordance with A.A.C. R14-3-105 of the Arizona Corporation Commission Rules of Practice and Procedure, TCG Phoenix applies for leave to intervene and in support of its application states as follows:

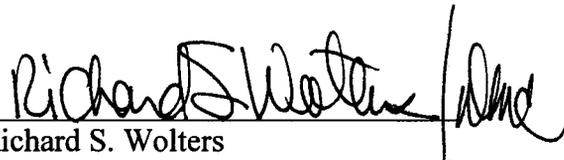
1. TCG Phoenix is a telecommunications corporation certified to provide intra- and interexchange telecommunications services throughout the state of Arizona.
2. TCG Phoenix has an approved interconnection with Qwest Corporation for the provision of interconnection, services and unbundled network elements. TCG Phoenix has an interest in agreements entered into between Qwest Corporation and other telecommunications carriers, as section 252(i) of the Telecommunications Act of 1996 allows other carriers to obtain interconnection, services and unbundled network elements under the same terms and conditions provided in the agreements.
3. TCG Phoenix's participation in this proceeding will not unduly broaden the nature or scope of the proposed merger.
4. If TCG Phoenix is granted intervention, communications should be sent to:

Richard S. Wolters  
TCG Phoenix  
1875 Lawrence Street, Suite 1503  
Denver, Colorado 80202  
(303) 298-6741 (Phone)  
(303) 298-6301 (Facsimile)

Teresa Ono  
TCG Phoenix  
795 Folsom Street  
San Francisco, California 94107  
(415) 442-2902 (Phone)  
(415) 977-6204 (Facsimile)

Accordingly, TCG Phoenix respectfully requests that the Arizona Corporation  
Commission issue an order granting TCG Phoenix intervention in this proceeding.

Dated this 16<sup>th</sup> day of April, 2002.

  
Richard S. Wolters  
TCG Phoenix  
1875 Lawrence Street, Suite 1503  
Denver, Colorado 80202  
(303) 298-6741 Voice  
(303) 298-6301 Fax  
rwolters@att.com Email

Attorney for TCG Phoenix.

**CERTIFICATE OF SERVICE**

I hereby certify that the original and 10 copies of **Application of TCG Phoenix for Leave to Intervene**, Docket No. RT-00000F-02-0271, were sent by overnight delivery on April 16, 2002 to:

Arizona Corporation Commission  
Docket Control – Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

Maureen Scott  
Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Ernest Johnson  
Director - Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

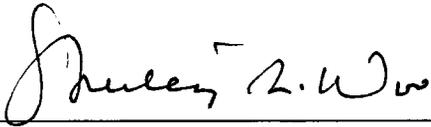
Lyn Farmer  
Chief Administrative Law Judge  
Arizona Corporation Commission  
400 West Congress  
Tucson, AZ 85701-1347

and a true and correct copy was sent by U.S. Mail on April 16, 2002 to:

Timothy Berg  
Fennemore Craig, P.C.  
3003 North Central Ave., #2600  
Phoenix, AZ 85012

Andrew Crain  
Qwest Corporation  
1801 California Street, Suite 4900  
Denver, CO 80202

Executed on April 16, 2002 in San Francisco, California.

  
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Shirley S. Woo