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INTERVENTION

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BEFORE THE ARIZONA CORPORATION COMMISSION

MAR 9 4 19 PM '99

ORIGINAL

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

DOCUMENT CONTROL

6	IN THE MATTER OF US WEST)	DOCKET NO. T-01051B-99-0068
7	COMMUNICATIONS, INC.'S STATEMENT OF)	
7	GENERALLY AVAILABLE TERMS AND)	ARIZONA PAYPHONE
8	CONDITIONS)	ASSOCIATION'S MOTION TO
)	INTERVENE

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

11 1. APA's members represent over 5,000 independently owned telephones in Arizona.
12 APA's members presently purchase or receive local exchange services from US West. APA's
13 members also compete with US West to the extent it (or its affiliates or subsidiaries) maintains pay
14 telephones in Arizona.

15 2. APA's members may also purchase services from competitive local exchange
16 carriers subject to US West's Generally Available Terms and Conditions.

17 3. APA seeks to participate in these proceedings to ensure US West's compliance with
18 all Arizona and Federal requirements.

19 4. APA's participation in this proceeding will not unduly broaden the nature or scope
20 of this proceeding.

21 5. No other party or intervenor can represent the interests of APA's members as
22 adequately and specifically as APA.

23
24

ROSHKA HEYMAN & DEWULF, PLC

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PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
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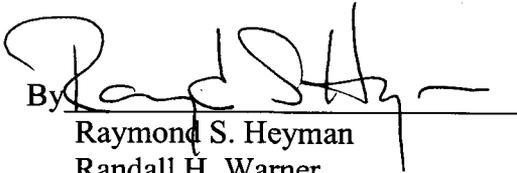
6. Service of all correspondence, documents or pleadings should be made to counsel for the APA as follows:

Raymond S. Heyman, Esq.
Randall H. Warner, Esq.
Roshka Heyman & DeWulf
Two Arizona Center
400 N. Fifth Street, Suite 1000
Phoenix, Arizona 85004

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

RESPECTFULLY SUBMITTED this 8th day of March, 1999.

ROSHKA HEYMAN & DEWULF, PLC

By 

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

Attorneys for Arizona Payphone Association

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1 **Original and ten copies of the foregoing**
2 **filed this 9th 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 9th 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**
25 **this 9th day of March, 1999, to:**

26 Vincent C. DeGarlais, Esq.
27 Andrew D. Crain, Esq.
28 Charles W. Steese, Esq.
29 US West Law Department
30 1801 California Street, Suite 5100
31 Denver, Colorado 80202

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