

ORIGINAL

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

KRISTIN K. MAYES - CHAIRMAN
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

2010 JUN 17 P 3:46

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

JUN 17 2010

DOCKETED BY	<i>MM</i>
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IN THE MATTER OF THE JOINT NOTICE AND)	DOCKET NOS: T-01051B-10-0194
APPLICATION OF QWEST CORPORATION,)	T-02811B-10-0194
QWEST COMMUNICATIONS COMPANY, LLC,)	T-04190A-10-0194
QWEST LD CORP., EMBARQ)	T-20443A-10-0194
COMMUNICATIONS, INC. D/B/A CENTURY)	T-03555A-10-0194
LINK COMMUNICATIONS, EMBARQ)	T-03902A-10-0194
PAYPHONE SERVICES, INC. D/B/A)	
CENTURYLINK, AND CENTURYTEL)	
SOLUTIONS, LLC FOR APPROVAL OF THE)	
PROPOSED MERGER OF THEIR PARENT)	APPLICATION TO INTERVENE
CORPORATIONS QWEST COMMUNICATIONS)	OF MCLEODUSA
INTERNATIONAL INC. AND CENTURYTEL,)	TELECOMMUNICATION
INC.)	SERVICES, INC. dba PAETEC
)	BUSINESS SERVICES

McLeodUSA Telecommunications Services, Inc. d/b/a PAETEC Business Services ("PAETEC" or "Applicant"), hereby requests to intervene in accordance with Rule 14-3-105 of the Arizona Corporation Commission Rules of Practice and Procedure in the above-captioned docket. In support of its petition, PAETEC states the following:

1. PAETEC is certificated to provide local exchange and intrastate interexchange services in Arizona.
2. PAETEC currently competes with, and obtains interconnection and related services and facilities from Qwest Corporation ("Qwest") in the provision of PAETEC's telecommunications services. PAETEC maintains local interconnection agreements with Qwest in its capacity as an incumbent local exchange carrier, entered into pursuant to sections 251 and 252

ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 of the Communications Act of 1934, as Amended by the Telecommunications Act of 1996, Pub.
2 L. 104-104, 110 Stat. 56, 47 U.S.C. Sections 151 *et. seq.* (the Act” or “1996 Act”).

3 3. PAETEC has a substantial interest in the proposed transfer of control of Qwest to
4 CenturyLink Inc. Qwest is the largest incumbent local exchange carrier in Arizona. PAETEC
5 relies on interconnection with, and related services and facilities obtained from, Qwest to offer and
6 provide service to PAETEC’s customers in Qwest’s service territory. PAETEC seeks to
7 participate in this proceeding to ensure that the proposed transaction will not adversely impact
8 competition in Arizona or PAETEC’s rights and ability to obtain the interconnection and related
9 services and facilities it needs to provide its telecommunications services.

10 4. PAETEC’s intervention and participation in this docket will not unduly broaden the
11 nature or scope of the Commission’s inquiry.

12 5. If PAETEC’s application is granted, pleadings and other communications should be
13 sent to:

14
15 Michael W. Patten
Roshka DeWulf & Patten, PLC
One Arizona Center
400 East Van Buren, Suite 800
16 Phoenix, Arizona 85004-3906
17 Tel: (602) 256-6100
18 Fax: (602) 256-6800
19 email: MPatten@rdp-law.com

20 and

21 William A. Haas
22 Vice President of Public Policy & Regulatory
PAETEC Holding Corp.
23 One Martha’s Way,
24 Hiawatha, Iowa 52233
email: William.Haas@paetec.com

25 WHEREFORE, PAETEC requests that the Arizona Corporation Commission issue an
26 order granting PAETEC’s request for intervention.

27

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RESPECTFULLY SUBMITTED this 17th day of June 2010.

MCLEODUSA TELECOMMUNICATIONS SERVICES,
INC. dba PAETEC BUSINESS SERVICES

By 
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Original and 13 copies of the foregoing
filed this 17th day of June 2010 with:

Docket Control
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Copy of the foregoing hand-delivered/mailed
this 17th day of June 2010 to:

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