

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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Arizona Corporation Commission
DOCKETED

JUL 12 2010

DOCKETED BY *MW*

2 KRISTIN K. MAYES
3 Chairman

4 GARY PIERCE
5 Commissioner

6 PAUL NEWMAN
7 Commissioner

8 SANDRA D. KENNEDY
9 Commissioner

10 BOB STUMP
11 Commissioner

11 IN THE MATTER OF THE JOINT NOTICE)
12 AND APPLICATION OF QWEST)
13 CORPORATION, QWEST)
14 COMMUNICATIONS COMPANY, LLC,)
15 QWEST LD CORP., EMBARQ)
16 COMMUNICATIONS, INC. D/B/A CENTURY)
17 LINK COMMUNICATIONS, EMBARQ)
18 PAYPHONE SERVICES, INC. D/B/A)
CENTURY LINK, AND CENTURYTEL)
SOLUTIONS, LLC, FOR APPROVAL OF THE)
PROPOSED MERGER OF THEIR PARENT)
CORPORATIONS, QWEST)
COMMUNICATIONS INTERNATIONAL)
INC., AND CENTURYTEL, INC.)

Docket Nos. T-01051B-10-0194
T-02811B-10-0194
T-04190A-10-0194
T-20443A-10-0194
T-03555A-10-0194
T-03902A-10-0194

**APPLICATION TO
INTERVENE**

19 Pursuant to Rule 14-3-105 of the Arizona Corporation Commission Rules of
20 Practice and Procedure, MCI metro Access Transmission Services LLC d/b/a Verizon
21 Access Transmission Services and MCI Communications Services, Inc. d/b/a Verizon
22 Business Services (collectively, "Verizon") apply to intervene in the above-captioned
23 proceeding and state the following:

24 1. Verizon, through Verizon Access Transmission Services and Verizon
25 Business Services, is certificated as a competitive local exchange carrier and
26

1 interexchange carrier in Arizona, and currently provides telecommunications services in
2 the state.

3 2. In order to provide retail services to Verizon's Arizona customers,
4 Verizon purchases wholesale services from Qwest. In addition, the retail services Verizon
5 offers in Arizona compete directly with services offered by Qwest.

6 3. As a competitor and customer of Qwest, Verizon will be directly and
7 substantially affected by the issues raised and the decisions made in this docket.

8 4. Verizon respectfully requests that its application to intervene be
9 granted at this time because Verizon's participation in this proceeding will not unduly
10 broaden the nature or scope of this proceeding and will not delay the proceedings. In
11 addition, as a customer and competitor of Qwest, Verizon's interests will not be
12 adequately represented by other parties to this proceeding, and as such, its participation in
13 this proceeding is in the public interest.

14 5. If Verizon is granted intervention, communications regarding this
15 matter should be addressed to the following persons:

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20 Phoenix, AZ 85004
21 (602) 262-5340

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27 WHEREFORE, Verizon respectfully requests that the Arizona Corporation
28 Commission issue an order granting MCI metro Access Transmission Services LLC d/b/a
29 Verizon Access Transmission Services and MCI Communications Services, Inc. d/b/a
30 Verizon Business Services intervention in the above-captioned proceeding.

1 RESPECTFULLY SUBMITTED this 12th day of July, 2010

2 LEWIS and ROCA, LLP

3
4 

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10 Attorneys for Verizon

11 ORIGINAL and thirteen (13) copies
12 of the foregoing filed
13 this 12th day of July, 2010, with:

14 The Arizona Corporation Commission
15 Utilities Division – Docket Control
16 1200 W. Washington Street
17 Phoenix, Arizona 85007

18 Copy of the foregoing hand-delivered
19 this 12th day of July, 2010, to:

20 Belinda Martin, Administrative Law Judge
21 Hearing Division
22 Arizona Corporation Commission
23 1200 W. Washington Street
24 Phoenix, Arizona 85007

25 Janice Alward, Chief Counsel
26 Legal Division
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