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# INTERVENTION

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AZ CORP COMMISSION

BEFORE THE ARIZONA CORPORATION COMMISSION

AUG 25 4 55 PM '97

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CARL J. KUNASEK  
Chairman  
JAMES M. IRVIN  
Commissioner  
RENZ D. JENNINGS  
Commissioner

Arizona Corporation Commission

**DOCKETED**

DOCUMENT CONTROL

AUG 25 1997

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF  
METRO CONNECTION, INC. DBA  
TRANSAMERICAN TELEPHONE FOR A  
CERTIFICATE OF CONVENIENCE AND  
NECESSITY TO PROVIDE LOCAL  
TELECOMMUNICATIONS SERVICES WITHIN  
THE STATE OF ARIZONA.

DOCKET NO. U-3402-97-386

**MOTION FOR LEAVE TO INTERVENE**

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Pursuant to Rule 14-3-105, Arizona Administrative Code, U S WEST Communications, Inc. ("U S West"), applies to this Commission for an order granting leave to intervene in the above-captioned proceeding.

The Commission should grant U S West leave to intervene in this matter because U S West is directly and substantially affected by these proceedings. Metro Connection, Inc. dba TransAmerican Telephone ("Metro Connection") is seeking a Certificate of Convenience and Necessity to provide local exchange telecommunications services within the State of Arizona. For many years, U S West exclusively provided local exchange services within the State of Arizona. As a result, Metro Connection will be required to interconnect with U S West, and the two telecommunications companies will have to provide services to each other if the Certificate is granted. Under these circumstances, U S West clearly has a substantial and direct interest in the

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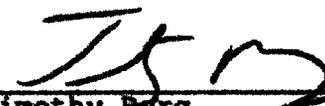
1 outcome of Metro Connection's application.

2 Further, U S WEST's participation in the proceeding will not  
3 unduly broaden the issues raised. The name, address and telephone  
4 number of the person upon whom service of all documents is to be  
5 made is:

6 Timothy Berg  
7 FENNEMORE CRAIG, P.C.  
8 3003 North Central Avenue  
9 Suite 2600  
10 Phoenix, Arizona 85012  
11 (602) 916-5421

12 RESPECTFULLY SUBMITTED this 25<sup>th</sup> day of August, 1997.

13 FENNEMORE CRAIG, P.C.

14 By   
15 Timothy Berg  
16 3003 North Central Avenue, Suite 2600  
17 Phoenix, Arizona 85012  
18 (602) 916-5421  
19 Attorneys for  
20 U S WEST Communications, Inc.

21 ORIGINAL and 10 copies of the  
22 foregoing hand-delivered for  
23 filing this 25<sup>th</sup> day of  
24 August, 1997, to:

25 Docket Control  
26 ARIZONA CORPORATION COMMISSION  
1200 West Washington  
Phoenix, Arizona 85007

COPIES of the foregoing hand-delivered  
this 25<sup>th</sup> day of August, 1997, to:

Lindy Funkhouser, Chief Counsel  
ARIZONA CORPORATION COMMISSION  
Legal Division  
1200 West Washington  
Phoenix, Arizona 85007

0000-4000-4000

1 Carl Dabelstein, Director  
ARIZONA CORPORATION COMMISSION  
2 Utilities Division  
1200 West Washington  
3 Phoenix, Arizona 85007

4 COPY of the foregoing mailed  
this 25<sup>th</sup> day of August, 1997, to:

5 Kyle L. Dickson  
6 Maxwell, Baker and McFatridge, P.C.  
17625 El Camino Real, Suite 310  
7 Houston, Texas 77058  
Attorneys for Metro Connection, Inc. dba TransAmerican Telephone

8 Patrick Will, President  
9 Metro Connection, Inc. dba TransAmerican Telephone  
209 East University  
10 Denton, Texas 76201

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