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*Attorney for AT&T Communications of the  
Mountain States, Inc. and TCG Utah*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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	)	DOCKET NO. 08-2430-01
In the Matter of Verizon’s Objection, Protest	)	
and Request for Investigation in Response to	)	PETITION TO INTERVENE OF
Qwest’s Recent Filing of its Revised Access	)	AT&T COMMUNICATIONS OF
Service Tariff Sheets 13, 13.1, and 16	)	THE MOUNTAIN STATES, INC.
	)	AND TCG UTAH

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In accordance with Rule R746-100-7 of the Commission’s Rules of Practice and Utah Code Ann. § 63G-4-207, AT&T Communications of the Mountain States, Inc., and TCG Utah (collectively the “AT&T Companies”), petition the Utah Public Service Commission for permission to intervene in this docket, and state:

**I. NOTICES**

The name, address, and telephone number of the person to whom communications to the AT&T Companies should be sent is:

Roger Moffitt  
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## **II. IDENTITY OF PETITIONER**

The AT&T Companies are telecommunications companies authorized to provide local exchange, intraexchange, and interexchange telecommunications services throughout Utah.

## **III. INTEREST OF PETITIONER**

The AT&T Companies' legal interests will be substantially affected by this proceeding, pursuant to section 63-4-207. The AT&T Companies provide interexchange services in Utah, and would be directly and materially affected by the tariff changes proposed by Qwest Corporation. The AT&T Companies have been in discussions with Qwest Corporation regarding these tariff changes, and have an interest in ensuring that the understandings in those discussions relating to the proposed tariff changes are fulfilled. The AT&T Companies' legal interests will not be adequately represented by any other party to this proceeding.

## **IV. NATURE OF INTERVENTION**

The evidence to be presented by the AT&T Companies, if any, will be of material value to the Commission in its determination of the issues involved in this proceeding, and the AT&T Companies' intervention will not broaden those issues or delay the proceedings.

Accordingly, the AT&T Companies request permission to intervene as a party to this proceeding and to participate to the full extent permitted under the Commission's rules and Utah law.

Respectfully submitted this 18<sup>th</sup> day of March 2009.

By: \_\_\_\_\_ /s/  
Roger Moffitt  
Utah State Bar No. 05320  
Attorney for AT&T Communications of the  
Mountain States, Inc. and TCG Utah

**CERTIFICATE OF SERVICE**

I hereby certify that on the 18<sup>th</sup> day of March, 2009, an original and five (5) true and correct copies of the PETITION TO INTERVENE OF AT&T COMMUNICATIONS OF MOUNTAIN STATES AND TCG UTAH was placed in overnight mail and an electronic copy was sent to via email to:

Ms. Julie Orchard  
Commission Secretary  
Public Service Commission of Utah  
160 East 300 South, Fourth Floor  
Salt Lake City, UT 84114  
[mlivingston@utah.gov](mailto:mlivingston@utah.gov)

and a true and correct copy was emailed and mailed, postage prepaid thereon to:

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Janice L. Ono