

Gregory J. Kopta (WSBA No. 20519)  
DAVIS WRIGHT TREMAINE LLP  
1201 Third Avenue, Suite 2200  
Seattle, Washington 98101-3045  
Telephone: (206) 757-8079  
Facsimile: (206) 757-7079  
E-mail: gregkopta@dwt.com

Attorneys for DIECA Communications, Inc.,  
d/b/a Covad Communications Company

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

-----  
In the Matter of )  
 ) DOCKET NO. 07-049-30  
QWEST CORPORATION )  
 ) PETITION OF COVAD TO  
Petition for Commission Approval of 2007 ) INTERVENE  
Additions to Non-Impaired Wire Center )  
List )  
-----

DIECA Communications, Inc., d/b/a Covad Communications Company

(“Covad”), hereby petitions the Commission, pursuant to Rule 746-100-7 and Utah Code  
§ 63-46b-9, for leave to intervene in the above-entitled docket.

**I. NOTICES**

The names, addresses, and telephone numbers of the persons to whom communications  
should be addressed are:

Gregory J. Kopta  
DAVIS WRIGHT TREMAINE LLP  
1201 Third Avenue  
Suite 2200  
Seattle, WA 98101-3045  
Voice: (206) 757-8079

Gregory T. Diamond  
Senior Counsel  
Covad Communications Company  
7901 Lowry Blvd.  
Denver, CO 80230  
Voice: (720) 670-1069

Fax: (206) 757-7079  
E-mail: [gregkopta@dwt.com](mailto:gregkopta@dwt.com)

Fax: (720) 670-3350  
E-mail: [gdiamond@covad.com](mailto:gdiamond@covad.com)

## **II. IDENTITY OF PETITIONER**

Covad is a Competitive Local Exchange Carrier (“CLEC”) certificated to provide both intraexchange and interexchange telecommunications services in Utah. Covad currently competes with, and obtains services and facilities from, Qwest Corporation (“Qwest”) in the provision of intraexchange and interexchange services.

## **III. INTEREST OF PETITIONER**

Covad has a substantial interest in the subject matter of this proceeding. Qwest has requested that the Commission approve additions to Qwest’s non-impaired wire center list. Qwest’s petition could impact the rates that Qwest offers its wholesale customers such as Covad if wire centers were added to the non-impaired list and certain unbundled network elements thus became unavailable at cost-based rates in those wire centers. The related increase in the rates Covad is charged for wholesale services that it purchases from Qwest could impact Covad’s ability to provide the products and services it offers to customers in those wire center areas. Covad, therefore, is materially interested in, and will be substantially affected by, the Commission’s resolution of the issues presented in this proceeding.

## **IV. REQUEST FOR INTERVENTION**

The evidence, if any, and briefing presented by Covad will be of material value to the Commission in its determination of the issues involved in this proceeding, and Covad’s intervention will not broaden those issues or delay the proceedings.

WHEREFORE, Covad prays for leave to intervene as a party to this proceeding, with the ability to participate to the full extent allowed by the Commission's rules and Utah law.

RESPECTFULLY SUBMITTED this 3rd day of August, 2007.

DAVIS WRIGHT TREMAINE LLP  
Attorneys for DIECA Communications, Inc., d/b/a  
Covad Communications Company

By \_\_\_\_\_  
Gregory J. Kopta  
WSBA No. 20519