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Attorneys for Verizon Wireless  
Submitted May 25, 2000

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In The Matter of Telephone Number Conservation )  
Measures for (801) Area Code Relief ) DOCKET NO. 99-999-04  
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In The Matter of the Request of North American )  
Numbering Plan Administrator for a New Area ) DOCKET NO. 99-999-05  
Code within the (801) Area Code )  
 ) **VERIZON WIRELESS'S**  
 ) **PETITION TO INTERVENE**

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In accordance with Rule R746-100-7 of the Commission's Rules of Practice and Utah Code § 63-46b-9, Verizon Wireless, formerly Airtouch Cellular ("Verizon"), petitions the Utah Public Service Commission for permission to intervene in this docket, and states:

**I. NOTICES**

The name, address, and telephone number of the persons to whom communications to Verizon should be sent are:

Andrea Cooper  
Numbering Director

2785 Mitchell Drive,  
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## **II. IDENTITY OF PETITIONER**

Verizon is a wireless company authorized to provide cellular service throughout Utah including the 801 Numbering Plan Area (“NPA”), and has been assigned number blocks within the 801 NPA.

## **III. INTEREST OF PETITIONER**

As a wireless service provider in the greater Salt Lake City area, Verizon relies on number resources being available. Any number shortage as well as the means to relieve the shortage in both the short and long run will directly affect Verizon and its ability to provide cellular service. Accordingly, Verizon has a direct and substantial interest in ensuring the efficient, nondiscriminatory, and competitively neutral availability and use of telephone number resources in the greater Salt Lake City area.

## **IV. NATURE OF INTERVENTION**

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

Accordingly, Verizon requests permission to intervene as parties to these proceedings and to participate to the full extent permitted under the Commission's rules and Utah Law.

On May 16, 2000 Verizon joined the Petition for Reconsideration filed by AT&T Communications of the Mountain States, Inc.

DATED this \_\_\_\_ day of May, 2000.

WOOD CRAPO LLC

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James W. Stewart  
Attorneys for Verizon Wireless

**CERTIFICATE OF SERVICE**

I certify that the original plus eight copies of **VERIZON WIRELESS'S PETITION TO INTERVENE** in Docket Nos. 99-999-04 and 99-999-05 were hand delivered and an electronic copy was e-mailed to [asmitch@state.ut.us](mailto:asmitch@state.ut.us) on May 25, 2000 to:

Ms. Julie Orchard Executive Secretary Utah Public Service Commission Heber M. Wells Building, 4 <sup>th</sup> Floor 160 East 300 South Salt Lake City, UT 84111	
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and a true and correct copy were sent by U. S. Mail, postage prepaid, on May 25, 2000 to:

Michael Ginsberg Assistant Attorney General Heber M. Wells Building, 4 <sup>th</sup> Floor 160 East 300 South Salt Lake City, UT 84111	Gregory J. Kopta Davis Wright Tremaine 2600 Century Square 1501 Fourth Avenue Seattle, WA 98101-1688
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