

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications )

and Energy on its own Motion into the Appropriate )

Regulatory Plan to succeed Price Cap Regulation for ) D.T.E. 01-31

Verizon New England, Inc., d/b/a Verizon Massachusetts' )

intrastate retail telecommunications services in the )

Commonwealth of Massachusetts )

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**PETITION TO INTERVENE OF QWEST COMMUNICATIONS CORPORATION**

Pursuant to 220 C.M.R. §1.03(1), Qwest Communications Corporation ("Qwest"), on behalf of itself and its affiliated entities that provide telecommunications services in Massachusetts, hereby petitions the Department of Telecommunications and Energy (the "Department") for leave to intervene as a party in this proceeding. Qwest's principal offices are located at 555 17<sup>th</sup> Street, Denver, Colorado 80202. As grounds for its Petition, Qwest states as follows:

1. Through various operating subsidiaries, Qwest is authorized to offer interstate, intrastate, local and international telecommunications services in each of the fifty states and the District of Columbia, and is a common carrier of telecommunications services authorized by the Department to provide interLATA and intraLATA services in Massachusetts. Qwest purchases switched access and other services from Verizon New England, Inc., d/b/a Verizon Massachusetts ("Verizon"). Qwest also competes with Verizon in the provision of certain intraLATA telecommunications services in Massachusetts.

2. As both a customer and competitor of Verizon, Qwest has a substantial interest in the rules the Department will establish to govern both the prices Verizon charges Qwest for the services Qwest purchases from Verizon, and the prices Verizon charges for the retail services against which Qwest's services compete. Qwest also has an interest in the form and substance of any plan to regulate the quality of the services Verizon provides, and the form and substance of any intrastate access charge reform proposed by Verizon in this investigation.

3. For the foregoing reasons, Qwest will be substantially and specifically affected by the Department's review and decision in this docket.

4. Qwest intends to fully participate in the proceedings in this docket and may, as necessary, conduct discovery, present witnesses, cross-examine witnesses, present legal arguments, file briefs, etc. to protect its interests.

WHEREFORE, Qwest respectfully requests leave to intervene in this proceeding.

Respectfully submitted,

QWEST COMMUNICATIONS CORPORATION

By its attorneys,

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