

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Verizon New England, Inc., et al)
for Investigation under Chapter 159, Section)
14 of the Intrastate Switched Access Rates of)
Competitive Local Exchange Carriers)

D.T.C. 07-9

MOTION OF LEVEL 3 COMMUNICATIONS, LLC FOR LEAVE TO INTERVENE

Pursuant to 220 C.M.R. §1.03, Level 3 Communications, LLC ("Level 3") hereby petitions the Department of Telecommunications and Cable (the "Department") for leave to intervene as a party in the above-referenced proceeding. In support of its Motion, Level 3 states as follows:

1. Level 3 is a Delaware limited liability company and an indirect, wholly-owned subsidiary of Level 3 Communications, Inc. Level 3 maintains its principal business office at 1025 Eldorado Boulevard, Broomfield, CO 80021. Level 3 provides high-quality voice and data services to carriers, internet service providers ("ISPs"), and other business customers over its IP-based network. In Massachusetts, Level 3 is a competitive local exchange carrier ("CLEC") authorized to provide resold and facilities-based local exchange and interexchange telecommunications services pursuant to the Statement of Business Operations ("SBO") on file with the DTC. Effective November 10, 2007, Level 3 revised its terminating switched access tariff, *i.e.*, M.D.T.C. Tariff No. 5.

2. The Department commenced this proceeding pursuant to Verizon New England, Inc.'s petition to investigate the intrastate switched access rates of CLECs that provide service in Massachusetts.

3. Level 3 requests that it be granted leave to intervene as a party in this proceeding to adequately present its position and its interests. Level 3 will be substantially and specifically affected by this proceeding because the policies and rates established by the Department could affect the switched access rates that Level 3 charges in Massachusetts.

4. Level 3's interests in this proceeding cannot be adequately addressed or represented by any other party. To protect its interests, Level 3 intends to participate in this proceeding, by performing some or all of the following: conducting discovery; submitting testimony; conducting cross examination; and filing comments and briefs. Level 3's participation will not cause delay or disrupt the orderly conduct of the Department's investigation, but will ensure the development of a complete record.

5. All communications and correspondence for this proceeding should be directed to:

Meabh Purcell, Esq.
Dewey & LeBoeuf, LLP
260 Franklin Street
Boston, MA 02110
Tel: (617) 748-6847
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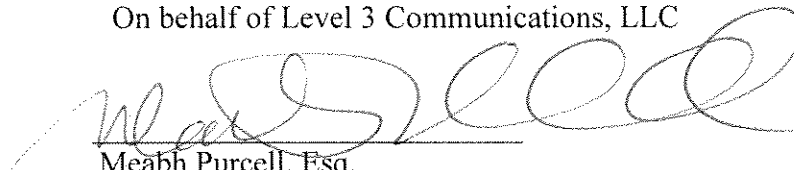
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If Level 3's petition is allowed, Ms. Purcell and Mr. Donahue would appear on behalf of Level 3 and hereby give notice of their appearances.

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WHEREFORE, for the foregoing reasons, Level 3 respectfully requests leave to
intervene as a party in this proceeding.

Respectfully submitted,
On behalf of Level 3 Communications, LLC

A handwritten signature in black ink, appearing to read 'Meabh Purcell', is written over a horizontal line.

Meabh Purcell, Esq.
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Dated: February 22, 2008

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document by e-mail and first class mail upon the service list in this proceeding.

A handwritten signature in cursive script, appearing to read 'Meabh Purcell', written over a horizontal line.

Meabh Purcell
DEWEY & LEBOEUF LLP
260 Franklin Street
Boston, Massachusetts 02110
(617) 748-6800

Dated: February 22, 2008