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COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY d/b/a VERIZON (Alternative Regulation Plan - Sixth Price Cap Compliance Filing)

DTE 00-101

PETITION OF AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

FOR LEAVE TO INTERVENE

AT&T Communications of New England, Inc. ("AT&T") petitions pursuant to 220 C.M.R. §1.03 for leave to intervene as a party to this proceeding. The business address of AT&T is 99 Bedford Street, Boston, Massachusetts 02111.

1. AT&T is a common carrier of telecommunications services authorized by the Department to provide both interLATA and intraLATA services in Massachusetts. AT&T purchases switched access and other services from New England Telephone and Telegraph Company, d/b/a Verizon ("Verizon"). AT&T also competes with Verizon in the provision of certain intraLATA telecommunications services in Massachusetts.

2. AT&T was a party to, and an active participant in, all aspects of the proceedings in DPU 94-50. AT&T was also a party to all of the preceding compliance filings submitted by Verizon-MA pursuant to the Department's order in DPU 94-50 and was an active participant in many of them. The present docket has been established by the Department to review the sixth compliance filing submitted by Verizon pursuant to the Department's final order in DPU 94-50. As both a competitor and customer of Verizon, AT&T has an interest in ensuring that Verizon has complied with all aspects of the Department's order in DPU 94-50, including, but not limited to, requirements regarding access-toll price relationships, price floors, price index calculations, and exogenous cost adjustments.

3. For the foregoing reasons, AT&T will be substantially and specifically affected by the Department's review and decision on Verizon's compliance filing. AT&T intends fully to participate in the proceedings in this docket.

4. AT&T will be represented in this docket by counsel, as follows:

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For the foregoing reasons, AT&T requests that it be granted leave to intervene as a party in this proceeding.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

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DATED: December 4, 2000