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VIA FEDERAL EXPRESS AND ELECTRONIC MAIL

April 14, 2008

Catrice C. Williams
Secretary of the Department
Department of Telecommunications and Cable
Two South Station
Boston, MA 02110

RE: DTC 07-9; Petition of Sprint Communications Company, L.P., Sprint Spectrum, L.P. and Nextel Communications of the Mid-Atlantic, Inc.'s

Dear Secretary Williams:

Enclosed please find an original and ten (10) copies of Sprint Communications Company, L.P., Sprint Spectrum, L.P. and Nextel Communications of the Mid-Atlantic, Inc.'s (collectively, "Sprint Nextel") Petition for Intervention in the above referenced matter. Additionally, Sprint Nextel has filed an electronic copy of its Petition for Intervention to dtc.ef/ling@state.ma.us, and the service list.

Please return a filed-stamped copy of the Petition for Intervention to me in the enclosed self-addressed, postage-prepaid envelope. Thank you for your attention to this matter. If you have any questions concerning this request, please do not hesitate to contact me at (703) 433-4248.

Sincerely.

Garnet Goins

Enclosures cc: service list

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES

In The Matter Of The Petition of

Verizon New England, Inc., MCI Metro Access Transmission Services of Massachusetts, Inc., d/b/a Verizon Access Transmission Services, MCI Communications Services, Inc., d/b/a Verizon Business Services, Bell Atlantic Communications, Inc., d/b/a Verizon Long Distance, and Verizon Select Services, Inc. for Investigation by the Department of Telecommunications and Cable of the Intrastate Switched Access Rates of Competitive Local Exchange Carriers that Provide Service in Massachusetts

D.T.C. 07-9

SPRINT COMMUNICATIONS COMPANY, L.P., SPRINT SPECTRUM L.P. AND NEXTEL COMMUNICATIONS OF THE MID-ATLANTIC, INC.'S PETITION FOR INTERVENTION

Pursuant to 220 C.M.R. 1.03, Sprint Communications Company, L.P., Sprint Spectrum, L.P., and Nextel Communications of the Mid-Atlantic, Inc. (collectively "Sprint Nextel") respectfully requests that the Massachusetts Department of Telecommunications and Cable ("Department") grant its Petition for Intervention in the above referenced matter. Sprint Nextel respectfully submits that all the factors for intervenor status, as set forth in 220 C.M.R. 1.03, support granting Sprint Nextel's Petition to Intervene. As the basis for its request, Sprint Nextel states as follows:

On October 11, 2007, Verizon New England Inc., MCImetro Access Transmission
 Services of Massachusetts, Inc., d/b/a Verizon Access Transmission Services, MCI
 Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications,

Inc. d/b/a Verizon Long Distance, and Verizon Select Services, Inc. (collectively, "Verizon") petitioned the Department under section 14 of chapter 159 of the General Laws of Massachusetts for an investigation of the intrastate switched access rates of competitive local exchange carriers ("CLECs") that provide service in Massachusetts.

- 2. On January 14, 2008, the Department opened an investigation under docket D.T.C. 07-9.
- 3. On February 26, 2008, the Department issued a Procedural Update providing a list of parties that intervened as well as a schedule for filing motions to dismiss --- February 27, 2008 and replies to motions to dismiss due March 3, 2008, which was later extended to March 5, 2008. As of the date of this Petition for Intervention, the motions to dismiss are currently pending before the Department.
- 4. Sprint Communications Company, L.P. operates as a competitive local exchange carrier ("CLEC") and interexchange carrier ("IXC") in Massachusetts and provides intrastate long distance services throughout the Commonwealth. Sprint Spectrum, L.P. and Nextel Communications of the Mid-Atlantic, Inc. operate as facilities based wireless carriers in the Commonwealth of Massachusetts. Thus, Sprint Nextel is a provider of local exchange, long distance, and wireless telecommunications services in the Commonwealth of Massachusetts. As a provider of IXC and wireless services, Sprint Nextel is a customer of each CLEC in Massachusetts by purchasing tariffed intrastate switched access services from each CLEC. Sprint Nextel has an interest in this proceeding because the outcome could impact the amount that it will be required to pay for intrastate switched access rates of CLECs operating in Massachusetts.
- 5. Sprint Nextel intends to fully participate in this proceeding by means of briefs, discovery, and potentially testimony and other evidence.

6. The interests of justice would be served by permitting this intervention. No other party can adequately represent Sprint Nextel's interests in this proceeding. No party would be unduly prejudiced by Sprint Nextel's intervention in this proceeding. Additionally, Sprint Nextel's intervention at this juncture should have no adverse impact on the conduct of the Commission's proceeding because a procedural schedule has not been finalized due to the pending motions to dismiss.

7. Sprint Nextel requests that all communications, correspondence, orders and other documentation relating to this proceeding be directed to the undersigned attorney. Sprint Nextel also requests that the undersigned attorney be placed on the official service list compiled for purposes of this proceeding. If Sprint Nextel's Petition is allowed, Garnet Goins would appear on behalf of Sprint Nextel and hereby give notice of such appearance.

WHEREFORE, Sprint Nextel respectfully requests that the Department grant its Petition for Intervention in this proceeding.

Respectfully Submitted,

Sprint Communications Company, L.P., Sprint Spectrum, L.P. and Nextel Communications of the Mid-Atlantic, Inc.

By Its Attorney

Garnet Goins (BBO# 641152)

Director & Attorney

Sprint Nextel

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Dated: April 14, 2008

CERTIFICATE OF SERVICE

I, Garnet Goins, hereby certify that, on April 14, 2008, I caused a true and correct copy of the foregoing document to be served by electronic mail, overnight delivery(*), and first class mail upon the following parties of record in D.T.C. 07-9:

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