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January 26, 2001

VIA FEDERAL EXPRESS/EMAIL

Mary L. Cottrell, Secretary

Department of Telecommunications & Energy

Commonwealth of Massachusetts

One South Station, Second Floor

Boston, MA 02110

**Re: D.T.E. 01-20 Investigation of Rates and Charges of
Verizon-Massachusetts for Unbundled Network Elements under Section 252 of the
Communications Act of 1996**

Dear Ms. Cottrell:

Please accept for filing in the above-referenced proceeding the original and one copy of the attached "Motion to Intervene of Allegiance Telecom of Massachusetts, Inc." and "Motion of Counsel to Appear *Pro Hac Vice*." In addition, I have also included one extra copy of the enclosed documents. Kindly date stamp and return that copy for our files.

Very truly yours,
Kevin Hawley

cc: Tina Chin, Esq., Hearing Officer (w/enc.)

Michael Isenberg, Esq., Telecommunications Director

Attached Service List (w/enc.)

DEPARTMENT OF TELECOMMUNICATIONS
COMMONWEALTH OF MASSACHUSETTS

Investigation by the Department of Telecommunications and Energy)
on its own Motion into the Appropriate Pricing, based upon Total)
Element Long-Run Incremental Costs, for Unbundled Network)
Elements and Combinations of Unbundled Network Elements, and) D.T.E. 01-20
the Appropriate Avoided Cost Discount for Verizon New England,)
Inc.) d/b/a Verizon Massachusetts' Resale Services in the)
Commonwealth of Massachusetts)

_____)

**MOTION TO INTERVENE OF ALLEGIANCE
TELECOM OF MASSACHUSETTS, INC.**

Pursuant to 220 CMR § 1.03, Allegiance Telecom of Massachusetts, Inc. ("Allegiance"), by undersigned counsel, hereby petitions, pursuant to 220 C.M.R. § 1.03, for leave to intervene as a party in this docket. Allegiance's address for purposes of this proceeding is as follows:

Allegiance Telecom of Massachusetts, Inc.

1950 Stemmons Freeway

Suite 3026

Dallas, TX 75207

Allegiance has a clear and cognizable interest in this proceeding sufficient to justify its intervention as of right. Allegiance is authorized by the Department of Telecommunications and Energy ("Department") to provide telecommunications services in Massachusetts as a competitive local exchange carrier ("CLEC"). Under Sections 251 and 252 of the Telecommunications Act of 1996, CLECs have the right to use Verizon-MA's transmission loops and other facilities to provide telecommunications service on rates, terms and conditions that are just and reasonable and nondiscriminatory. *See* 47 U.S.C. § 251(c)(2).

CONCLUSION

For the forgoing reasons, Allegiance respectfully requests that the Department grant it the right to intervene in this proceeding.

Respectfully submitted.

Eric Branfman

Kevin Hawley

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Counsel for Allegiance Telecom of Massachusetts , Inc.

Dated: January 26, 2001

COMMONWEALTH OF MASSACHUSETTS

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Inc. d/b/a Verizon Massachusetts' Resale Services in the)

Commonwealth of Massachusetts)

)

MOTION OF COUNSEL TO APPEAR *PRO HAC VICE*

The undersigned counsel respectfully move for leave to appear *Pro Hac Vice* in the above-captioned proceeding. Both of the undersigned counsel are members of good standing in the District of Columbia Bar and both have appeared previously in cases before this Department, including D.T.E. 98-57.

Respectfully submitted,

Eric Branfman

Kevin Hawley

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Counsel for Allegiance Telecom of Massachusetts, Inc.

Dated: January 26, 2001

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January, 2001, copies of the foregoing MOTION TO INTERVENE OF ALLEGIANCE TELECOM OF MASSACHUSETTS, INC. and MOTION OF COUNSEL TO APPEAR PRO HAC VICE; D.T.E. 01-20, were sent via first-class mail, U.S. postage prepaid, to the parties on the attached service list.

Sonja Sykes-Minor

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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d/b/a Verizon Massachusetts' Resale Services in the Commonwealth)
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As of January 26, 2001

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