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 IDAHO PUBLIC  
 UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IPUC RESPONSE TO )**  
**FCC ORDER ON REVIEW OF SECTION 251 )**  
**UNBUNDLING OBLIGATIONS OF )**  
**INCUMBENT LOCAL EXCHANGE )**  
**CARRIERS (CC DOCKET NO. 01-338 )**  
**)** **CASE NO. GNR-T-03-23**  
**)**  
**\_\_\_\_\_ )**  
**NINE-MONTH REVIEW ON ECONOMIC )**  
**AND OPERATIONAL IMPAIRMENT )**  
**REGARDING ACCESS TO SPECIFIC UNES )**

**AT&T COMMUNICATIONS OF THE  
 MOUNTAIN STATES, INC.'S PETITION TO INTERVENE**

In accordance with IPUC 072 and the Idaho Public Utilities Commission's (Commission) Notice of State Proceeding and Notice of Right to Intervene dated June 17, 2003, AT&T Communications of the Mountain States, Inc. ("AT&T") files this petition to intervene and, in support of its petition, states as follows:

1. AT&T is a telecommunications carrier authorized to provide various telecommunications services in Idaho.
2. The Commission has opened this proceeding to address the Federal Communications Commission's ("FCC") Triennial Review Order relating to new rules

regarding the availability of unbundled network elements and competitive local exchange carriers' economic or operational impairment issues related to the same.

3. As a prospective purchaser of unbundled network elements and a duly authorized competitive local exchange carrier ("CLEC"), AT&T has a direct interest in any proceeding addressing these issues.

4. AT&T requests that all pleadings, notices, and other filings be sent to:

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1875 Lawrence Street, Suite 1575  
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(303) 298-6475 (Phone)  
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(lsfriesen@att.com)

Robert M. Pomeroy, Jr.  
Holland & Hart  
8390 East Crescent Parkway  
Suite 400  
Greenwood Village, Colorado 80111  
(303) 290-1622 (Phone)  
(303) 290-1606 (Fax)  
(bpomeroy@hollandhart.com)

5. AT&T's intervention will not unduly broaden the issues in this proceeding; rather, AT&T's participation will enhance and further inform the existing issues and record in this proceeding.

6. Accordingly, AT&T requests the Commission grant its intervention in this case with full rights of participation as a party.

Respectfully submitted this 20<sup>th</sup> day of June 2003.

**AT&T COMMUNICATIONS OF THE  
MOUNTAIN STATES, INC.**

By:   
Mary B. Tribby  
Letty S.D. Friese  
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Mountain States, Inc.  
1875 Lawrence Street, Room 1575  
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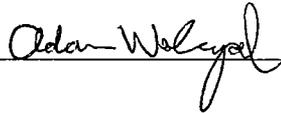
CERTIFICATE OF SERVICE

I certify that the original and seven copies of AT&T Communications of the Mountain States, Inc.'s Petition to Intervene in Docket No. GNR-T-03-23 were sent by overnight delivery on June 20, 2003 to:

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, ID 83702-5983

and a true and correct copy was sent by U. S. Mail, postage prepaid, on June 20, 2003 to:

Robert M. Pomeroy, Jr.  
Holland & Hart  
8390 E. Crescent Parkway, Suite 400  
Greenwood Village, CO 80111

A handwritten signature in cursive script, appearing to read "Orlan Welby", is written over a horizontal line.