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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorneys for Qwest Corporation

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

**QWEST CORPORATION'S PETITION TO
INTERVENE**

**NINE-MONTH REVIEW OF ECONOMIC AND
OPERATIONAL IMPAIRMENT REGARDING
ACCESS TO SPECIFIC UNES**

Qwest Corporation ("Qwest"), by and through its attorneys of record, respectfully petitions the Idaho Public Utilities Commission ("Commission") for leave to intervene in the above captioned proceeding pursuant to the Commission's Rules of Practice and Procedure for the following reasons:

1. Qwest is a corporation authorized to do and doing business in the state of Idaho, with its principal Idaho business office located at 999 Main Street, Boise, Idaho, 83702. Qwest

is a corporation organized under the laws of the state of Colorado and is authorized to engage in the furnishing of general telephone service in the north central and southern portions of Idaho and elsewhere in the western United States.

2. Qwest has a direct and substantial interest in the above entitled proceedings because, as an incumbent local exchange carrier it is required to provide “non-discriminatory access to network elements on an unbundled basis at any technically feasible point on rates, terms, and conditions that are just reasonable and non-discriminatory.” 47 U.S.C. § 251(c)(3) This case potentially impacts Qwest’s obligations to provide unbundled network elements. Qwest does not expect that its intervention will broaden the issues in this case or prejudice any party.

3. Qwest desires to intervene in order that it might receive documents and if its interests require, comment, cross-examine witnesses and present evidence in this case. At this point, Qwest cannot inform the Commission or other parties how involved its individual participation in this proceeding will be because the positions of the other parties and the Commission’s Staff are not yet fully known. Therefore, Qwest cannot presently inform the Commission as to the type of evidence it will present if any, or the length of time necessary for such presentation.

4. Qwest recognizes that this Petition is being filed after the Commission’s June 27 deadline. However, the Commission has not yet undertaken any review of the case and the Federal Communications Commission has not yet released its order, which is expected to provide guidance on the topics addressed in this docket. Qwest believes, therefore, that no party will be prejudiced and that the Commission’s consideration of this case will not be delayed by this Petition.

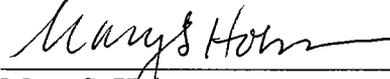
5. It is respectfully requested that all pleadings, testimony, exhibits, orders of the Commission and any other documents relating to this proceeding be served upon the Qwest and its attorneys, to wit:

Mary S. Hobson
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1600 7th Avenue - Room 3206
Seattle, WA 98191

Respectfully submitted this 1st day of July, 2003.

Qwest Corporation



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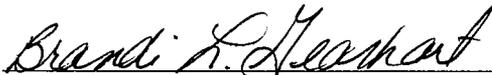
Attorneys for Qwest Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2003, I served QWEST CORPORATION'S
PETITION TO INTERVENE as follows:

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