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July 31, 2007

Electronically and via UPS Overnight

Frances Nichols
Public Utility Commission of Oregon
550 Capitol Street NE
Suite 215
Salem, OR 97301-2551


Re: Docket UM 1326

Dear Ms. Nichols:

Attached for filing in the above referenced docket is Petition to Intervene of Covad Communications Company. The original plus one copy will be sent via UPS Overnight.

Very truly yours,

Davis Wright Tremaine LLP



Mark P. Trinchero

MPT:bl

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1326

In the Matter of)	
)	
QWEST CORPORATION)	PETITION TO INTERVENE
)	
Petition for Commission Approval of 2007)	
Additions to Non-Impaired Wire Center List)	

PETITION TO INTERVENE OF COVAD COMMUNICATIONS CO.

Covad Communications Company ("Covad") respectfully petitions the Commission for leave to intervene in the above-captioned proceeding.

In support of its petition, Covad states as follows:

I.

Covad's name and address are:

Covad Communications Co.
7901 Lowry Blvd.
Denver, CO 80230

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II.

All correspondence in this matter should be directed to:

Gregory Diamond
Covad Communications Co.
7901 Lowry Blvd.
Denver, Colorado 80230
Telephone: (720) 670-1069
Facsimile: (720) 670-3350
E-mail: gdiamond@covad.com

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III.

Covad has an interest in the subject matter of this proceeding. Covad is a competitive telecommunications service provider authorized to provide local exchange service in the State of Oregon. Covad offers intrastate telecommunications services within Oregon, including local exchange service and intrastate long distance service. Covad purchases unbundled network elements (UNEs) from Qwest Corporation (Qwest), pursuant to the parties' interconnection agreement, in order to provide those services.

On June 22, 2007, Qwest filed a petition in this docket requesting that the Commission approve additions to Qwest's non-impaired wire center list. Qwest's petition could impact the rates that Qwest offers its wholesale customers, such as Covad, if wire centers were added to the non-impaired list and certain products and services thus became unavailable to competitive providers at UNE rates in those wire centers. Changes in the rates Covad is charged for wholesale services that it purchases from Qwest could impact Covad's ability to offer the products and services it offers in Oregon. Covad therefore submits this Petition to Intervene because it is materially interested in, and will be substantially affected by, the Commission's resolution of the issues presented in this proceeding.

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IV.

Covad expects to participate in the docket to contribute to the investigation its factual history and perspective as a wholesale customer/competitor of Qwest. Covad will address such issues as it deems relevant in this proceeding.

IV.

Covad has knowledge and expertise that will assist the Commission and the parties in addressing the issues presented in this proceeding.

V.


Covad's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

CONCLUSION

Covad's Petition to Intervene should be granted.

DATED this 31st day of July, 2007.

DAVIS WRIGHT TREMAINE LLP



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Attorneys for Covad Communications Co.

CERTIFICATE OF SERVICE

UM 1326

I hereby certify on this 31st day of July, 2007, the Petition to Intervene of Covad Communications Company, signed by Mark P. Trincherro was sent via UPS overnight mail to the Oregon Public Utility Commission.

A copy of the filing was sent via U.S. Mail to the service list below.

Carla Butler Senior Paralegal Qwest Corporation 421 SW Oak St. Suite 810 Portland, OR 97204 carla.butler@qwest.com	Alex M. Duarte Corporate Counsel Qwest Corporation 421 SW Oak St. Suite 810 Portland, OR 97204 alex.duarte@qwest.com
Ginny Zeller Eschelon Telecom of Oregon Inc. 730 Second Ave. S., Suite 900 Minneapolis, MN 55402-2489 gazeller@eschelon.com	

DAVIS WRIGHT TREMAINE LLP

By: Barbara Lasswell
Barbara Lasswell for Mark P. Trincherro