

COPY

September 22, 2003

VIA HAND DELIVERY

Luly E. Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 3550 - DPUC Implementation of the Federal Communications
Commission's Triennial Review Order

Dear Ms. Massaro:

On behalf of AT&T Communications of New England, Inc., enclosed please find an original and nine (9) copies of a Motion to Intervene in the above-referenced docket.

Kindly note that, pursuant to your email of September 15, 2003, we have designated in the Motion the three (3) names that may be placed on the official Service List for AT&T. Accordingly, please insert these names in the official Service List and delete the names of Harry M. Davidow, Esq. and Deborah Medeiros that appear on the prior official service lists. To the extent possible, we would ask that you retain all existing AT&T contacts on the informal email distribution list.

Should you have any questions regarding the foregoing, please do not hesitate to contact me.

Very truly yours,

BROWN RUDNICK BERLACK ISRAELS LLP

By: 

William M. Dolan III

/dm

Enclosures

cc: Service List (w/enclosure) Via Electronic and First Class Mail

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

In Re: Implementation of the Requirements of)
The Federal Communications Commission's)
Triennial Review Order) Docket No. 3550

**MOTION TO INTERVENE OF AT&T COMMUNICATIONS
OF NEW ENGLAND, INC.**

AT&T Communications of New England, Inc. ("AT&T"), with a business address at 99 Bedford Street, Boston, Massachusetts, hereby moves, pursuant to the Rules of Practice and Procedure, Sections 1.5, 1.7 and 1.13 of the Public Utilities Commission of the State of Rhode Island ("Commission"), to intervene as a party in the above-referenced proceeding. The grounds for this Motion are as follows:

1. AT&T is a common carrier of telecommunications services certified by the Commission to provide a broad range of residential and business telecommunications services in the State of Rhode Island.
2. The Federal Communications Commission's August 21, 2003, *Triennial Review Order* ("*FCC Order*") contained important findings that will have a significant impact on AT&T's future ability to compete in the competitive local exchange marketplace. In accordance with the *FCC Order*, the Commission will undertake this proceeding to review, analyze, and determine issues regarding the continued ability of competitive local exchange carriers ("CLECs"), including AT&T, to access unbundled network elements ("UNEs"). The Commission's review will include whether there is any basis for overturning the national finding

that CLECs would be impaired competing in the local market without access to local switching, loops and dedicated transport.

3. AT&T has a direct and substantial interest in the issues that will be addressed in this proceeding given its necessary reliance on UNEs to serve the local market. No other party to this proceeding can adequately represent AT&T's unique interests.

4. The persons who should be included on the official service list and to whom all notices, correspondence, and other communications regarding this proceeding should be directed are:

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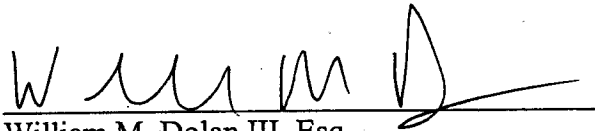
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WHEREFORE, AT&T respectfully requests that the Department grant its motion for party status in this proceeding.

Dated: September 22, 2003

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

By its Attorneys



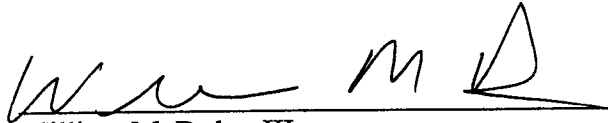
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Seeking Motion for Admission Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of September 2003, I served a true copy of the within Motion to Intervene of AT&T Communications of New England, Inc. by electronic mail and first class mail, postage prepaid, upon the parties identified in Docket 3550's Interim Service List.

A handwritten signature in black ink, consisting of a stylized 'W', 'M', and 'D' followed by a horizontal line.

William M. Dolan III