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September 16, 2003

**VIA FEDERAL EXPRESS AND  
ELECTRONIC MAIL**

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

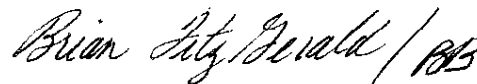
Dear Ms. Massaro:

On behalf of Cox Rhode Island Telcom, L.L.C., enclosed please find an original and nine copies of a Motion to Intervene in the above-referenced docket.

Please time and date-stamp the extra copy of this letter and return it to me in the enclosed self-addressed, stamped envelope.

If you have any questions regarding this filing, please contact me.

Respectfully submitted,



Brian T. FitzGerald (#6568)

BTF/rsb

Enclosure

cc: Jennifer J. Marrapese, Esq.  
Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

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In Re: DPUC Implementation of the  
Federal Communications Commission's  
Triennial Review Order

Docket No. 3550

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**MOTION TO INTERVENE OF COX RHODE ISLAND TELCOM, L.L.C.**

Now comes Cox Rhode Island Telcom, L.L.C. ("Cox") and respectfully requests the right to intervene as a party in the above-referenced proceeding pursuant to Section 1.13(a) of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure. In support of this Motion to Intervene, Cox states as follows:

1. Cox is authorized by the Rhode Island Public Utilities Commission ("Commission") to provide telephone service as a competitive local exchange carrier.
2. The Commission established the above-referenced proceeding in order to implement the requirements of the Federal Communications Commission's ("FCC") Triennial Review Order<sup>1</sup> ("Order or TRO").
3. Cox will be directly affected by any decision in this proceeding, as it will determine the availability of and rates for certain Unbundled Network Elements ("UNEs"), which Cox may seek to purchase, or which Cox's competitors may seek to purchase. Affording Cox an opportunity to participate in this docket clearly promotes the public interest.
4. As a facilities-based provider of local exchange services in Rhode Island, no other party can adequately represent the unique interest of Cox.

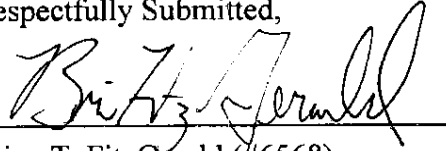
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<sup>1</sup> Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98; and Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147, FCC 03-36, Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, released August 21, 2003.

**WHEREFORE**, for the reasons set forth in this Motion to Intervene, Cox respectfully requests that the Commission grant Cox the right to intervene as a party in this proceeding in order to protect its interest.

Dated: September 16, 2003

Respectfully Submitted,

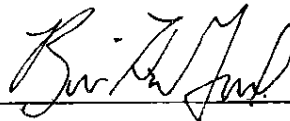


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Attorneys for  
Cox Rhode Island Telcom, L.L.C.

#### CERTIFICATION OF SERVICE

I, the undersigned, hereby certify that on the 16<sup>th</sup> day of September, 2003, I did cause a true and accurate copy of the within Motion to Intervene to be served by electronic mail and first class mail, postage prepaid, upon each party included on the service list for this docket.



Brian T. FitzGerald