

September 1, 2005

Via Hand Delivery and Electronic Mail

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

Re: Docket No.: 3692; Motion to Intervene of Cox Rhode Island Telcom, LLC

Dear Luly:

Enclosed are an original and nine copies of the above-referenced Motion.

Thank you for your attention to this filing.

Sincerely,



Craig L. Eaton #5515
Attorney for Cox Rhode Island Telcom, LLC

Enclosure

cc: Thomas Ahern, Division Administrator (with enclosure) (via hand delivery)
Alexander Moore, Esquire (with enclosure) (via regular U.S. Mail, postage prepaid)

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

In Re: Successor Alternative Regulation Plan : Docket No. 3692
for Verizon New England Inc, d/b/a Verizon Rhode Island

Motion to Intervene

Introduction:

Cox Rhode Island Telecom, LLC ("Cox") respectfully requests, pursuant to Rule 1.13(b)(2), intervention in the above-referenced docket. This docket has been established for the Commission to evaluate a successor alternative regulatory plan filed by Verizon – Rhode Island ("Verizon") on August 19, 2005.

Grounds For Intervention:

Cox has a significant interest in this proceeding which is not adequately represented by other parties. Any decision by the Commission in this proceeding will be directly relevant to Cox. Specifically, Cox is a registered CLEC within Rhode Island, competing with Verizon, the incumbent local exchange carrier. The basis for Verizon's filing is that the competitive market has continued to change and that Verizon needs further operating and pricing flexibility. Cox's ability to compete within the Rhode Island market will be directly affected by the Commission proceeding. Further, it is in the public interest to allow a CLEC such as Cox to intervene in this Docket.

Position Of The Company:

At this point in time, Cox has no position with regard to the filing. After Cox further evaluates the filing in its entirety, it will be able to take a more substantive position.

Request For Intervention:

For the above-stated reasons, Cox hereby requests full intervention in Docket 3692.

Respectfully Submitted

Cox Rhode Island Telcom, LLC

By Its Attorney,



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