STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

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INDIANA UTILITY REGULATORY COMMISSION

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| IN THE MATTER OF THE PETITION OF INDIANA BELL TELEPHONE COMPANY, INCORPORATED, D/B/A AMERITECH INDIANA PURSUANT TO I.C. 8-1-2-61 FOR A THREE-PHASE PROCESS FOR COMMISSION REVIEW OF VARIOUS SUBMISSIONS OF AMERITECH INDIANA TO SHOW COMPLIANCE WITH SECTION 271(C) OF THE TELECOMMUNICATIONS ACT OF 1996 | ) | CAUSE NO. 41657 |

**RHYTHMS LINKS INC.'S PETITION TO INTERVENE**

Rhythms Links, Inc. ("Rhythms"), by counsel, moves the Indiana Utility Regulatory Commission (the "Commission") pursuant to 170 IAC 1-1-9 for leave to intervene and be deemed a party in the above-captioned proceeding. In support of this Petition, Rhythms cites the following:

1. Rhythms is a Delaware corporation with offices at 7337 South Revere Parkway, Englewood, Colorado 80112, and is authorized to conduct business in the State of Indiana. Rhythms is a provider of high-speed, broadband voice and data telecommunications services.

2. Rhythms is authorized to provide facilities-based and resold local, intra-exchange, and long distance telecommunications services throughout the State of Indiana. See *In Re ACI*, IURC Cause No. 41227 (Approved January 8, 1999), *In Re ACI*, IURC Cause No. 41266 (Approved October 28, 1998), and *In Re ACI*, IURC Cause No. 41267 (Approved February 3, 1999).[1]

3. Rhythms has a substantial interest in this proceeding because it is authorized to and in fact is providing facilities-based telecommunications services to customers in Ameritech's service area. Rhythms is a purchaser of Ameritech Indiana's wholesale products and as a

[1] On July 12, 1999, Rhythms Links, Inc. was substituted in place of ACI as the certificated entity.

competitor of its retail products, Rhythms purchases certain unbundled network elements from Ameritech in order to provide such services.

4. Rhythms is represented by the following counsel in this proceeding who are authorized to accept service of all papers and pleadings on its behalf and should be served with all matters of record:

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5. The granting of party status to Rhythms will not unduly broaden the issues considered in this proceeding. To the contrary, granting Rhythms party status will effectuate a full consideration of the issues.

6. Rhythms agrees to be bound by all stipulations, rulings and other matters of record prior to the time its petition to Intervene is granted by the Commission.

*WHEREFORE*, Rhythms Links Inc. respectfully petitions the Commission to grant its intervention and accord it party status in this proceeding and for all other just and proper relief.

Respectfully submitted,

**RHYTHMS LINKS INC.**

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Counsel for Rhythms Links Inc.

## CERTIFICATE OF SERVICE

The undersigned certifies that on this 30th day of November, 2000, a copy of the foregoing *Petition to Intervene* was served by U.S. First Class mail to the offices of:

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