

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company :
 : 12-0155
Petition for Protective Order :
 :

PETITION TO INTERVENE

XO Communications Services, Inc. ("XO"), by its attorneys, hereby petitions to intervene in the above captioned proceeding, pursuant to Section 200.200 of the Rules of Practice of the Illinois Commerce Commission ("Commission"). In support of its Petition, XO states as follows:

1. XO is a corporation duly authorized to do business in the State of Illinois, and is subject to the jurisdiction of the Commission. XO is a telecommunications carrier pursuant to Section 13-202 of the Illinois Public Utilities Act. 220 ILCS 5/13-202.
2. The 2011 Interconnection Report filed by AT&T contains, in part, XO's confidential and proprietary information.
3. In a March 8, 2012 Notice of Ruling, the Administrative Law Judge stated, in part: "Illinois Bell Telephone Company ("Petitioner") shall file with the Chief Clerk of the Commission by March 19, 2012, a "Compliance Filing" explaining what specific harm Petitioner fears will occur and how that harm will occur if confidential treatment were granted for a period of two years rather than five years."
4. XO seeks to have the opportunity to comment on the confidential nature of information disclosed by AT&T.
5. The Commission's determinations in the instant proceeding will have a direct impact upon XO.
6. No other party to this proceeding will be able to adequately represent XO's interests.

7. XO accepts the record as it currently exists and is not attempting to intervene for the purposes of delay.
8. Counsel for XO has consulted counsel for the Commission Staff and AT&T. Neither party objects to XO's intervention in this proceeding.
9. If the Commission grants XO's petition to intervene, please add the following individuals to the service list:

Thomas H. Rowland
Rowland & Moore LLP
200 West Superior Street
Suite 400
Chicago, Illinois 60654

WHEREFORE, XO respectfully requests that the Commission grant it leave to intervene.

Respectfully submitted,

s/ Thomas H. Rowland

Thomas H. Rowland

Counsel for XO Communications Services, Inc.

CERTIFICATE OF SERVICE

I, Thomas H. Rowland, an attorney, certify that I served a copy of the Petition to Intervene of XO Communications Services, Inc. to all parties on the service list maintained by the Commission via e-mail on March 19, 2012.

s/ Thomas H. Rowland

Thomas H. Rowland
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