

Illinois Bell Telephone Company

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**Filing to Increase Unbundled Loop
And Nonrecurring Rates**

ICC Docket No. 02-0864

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CLERK'S OFFICE

**SAGE TELECOM, INC.'S
PETITION TO INTERVENE**

Sage Telecom, Inc. (Sage), by its attorney, respectfully petitions to intervene in this proceeding as authorized by Title 83, Section 200.200 of the Illinois Administrative Code. In support of its Petition, Sage respectfully states:

1. Sage is a corporation duly authorized to do business in the State of Illinois. Sage has its principal offices at 805 Central Expressway South, Suite 100, Allen, Texas 75013-2789, telephone number (214) 495-4700, and facsimile number (214) 495-4795.
2. Sage is a telecommunications carrier authorized to provide competitive local exchange and interexchange telecommunications services within Illinois. *See Application for a Certificate of Local and Interexchange Authority to Operate as a Facilities Based Carrier and/or Reseller of Telecommunications Services in the State of Illinois*, Docket No. 01-0508, Order (October 26, 2001) (granting Certificate of Service Authority).
3. Sage is interested in this proceeding because the ruling in this proceeding will affect the rights and interests of Sage. Sage will soon offer telecommunications services to residential customers in Illinois Bell Telephone Company's (Bell's) service area in Illinois, with a particular focus on rural and suburban customers. Sage relies on Bell's unbundled network element platform (UNE-P) to provide many of these services. Consequently, any increases in Bell's UNE rates will materially impact Sage.

4. In order to protect its rights and interests, Sage respectfully prays for leave to intervene and treatment as a party to the proceeding.

5. Sage hereby designates the following persons to receive service on its behalf:

Mr. Gary P. Nuttall
VP, Chief Technical Officer
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6. Undersigned counsel for Sage respectfully requests special leave under Title 83, Section 200.90(a) of the Illinois Administrative Code to represent Sage in this proceeding. Counsel for Sage is licensed to practice law in Texas. The Public Utility Commission of Texas (PUCT) allows attorneys licensed to practice law in Illinois to represent parties at the PUCT. *See* PUCT Procedural Rule 22.101, available electronically at <http://www.puc.state.tx.us/rules/procrules/pr-f/22.101/22.101.pdf> (only requiring a party to designate an authorized representative and not requiring a party to have counsel licensed in Texas (or, indeed, any counsel at all)). Furthermore, counsel's request for special leave to participate in this proceeding furthers the interests of a complete factual record, fairness, expedition, convenience, and cost-effectiveness as outlined in Title 83, Section 200.25 of the Illinois Administrative Code. Specifically, Sage is a moderately sized CLEC (although growing) that provides service primarily to rural and suburban residential customers. Sage's headquarters are outside of Illinois, although Sage is very interested in providing telecommunications choices to Illinois customers at reasonable rates. Consequently, Sage's participation through its national

counsel will allow Sage to reasonably participate in this proceeding, thus introducing the perspective of a CLEC that focuses on residential customers in rural and suburban areas and promoting the interests of fairness, convenience, and cost-effectiveness.

7. To the extent practicable, Sage agrees to accept service of documents by electronic means as provided for in Title 83, Section 200.1050 of the Illinois Administrative Code.

8. Sage accepts the status of the record as it exists today and is not requesting party status for purposes of delay. Sage will take a moderately limited role in this proceeding, focusing on issues that are particularly important to Sage. Consequently, Sage's intervention will not delay this proceeding.

Prayer for Leave to Intervene

For the foregoing reasons, Sage respectfully requests that this Commission grant its Petition to Intervene, and treat Sage as a party to this proceeding pursuant to Section 200.200.

Respectfully submitted,

SMITH, MAJCHER & MUDGE, L.L.P.

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By:



Jason Wakefield

Texas State Bar No. 00789849

ATTORNEYS FOR SAGE TELECOM,
INC.

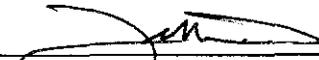
**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

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TO: Attached Service List

NOTICE OF FILING

Please take notice that on January 27, 2003, the undersigned filed via-E-Docket, **Sage Telecom, Inc.'s Petition to Intervene** with the Clerk of the Illinois Commerce Commission.



Jason Wakefield, an attorney
for Sage Telecom, Inc.

CERTIFICATE OF SERVICE

I, Jason M. Wakefield, an attorney, on oath state that I served this **Notice of Filing and Sage Telecom, Inc.'s Petition to Intervene** to each person on the attached Service List, via electronic mail and by deposit in the U.S. Mail with proper postage prepaid on this the 24th day of January, 2003.



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