

**BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION
COMMISSION**

In the Matter of the Joint Application
of

**EMBARQ CORPORATION AND
CENTURYTEL, INC.**

For Approval of Transfer of Control
of United Telephone Company of the
Northwest d/b/a Embarq and Embarq
Communications, Inc.

DOCKET NO. UT-082119

**PUBLIC COUNSEL'S RESPONSE
TO IBEW'S MOTION TO DISMISS,
OR IN THE ALTERNATIVE, TO
SUSPEND THE PROCEDURAL
SCHEDULE**

1. Public Counsel does not oppose the Motion of International Brotherhood of Electrical Workers (IBEW), Local 89, to dismiss, or in the alternative, to suspend the procedural schedule filed in the above-captioned case on January 29, 2009. IBEW raises legitimate concerns regarding the adequacy of the filing. These concerns can be addressed through either alternative presented in the Motion.

Dated this 9th day of February, 2009.

ROBERT M. McKENNA
Attorney General

SARAH A. SHIFLEY
Assistant Attorney General
Public Counsel