SCOTT J. RUBIN ATTORNEY • CONSULTANT

333 OAK LANE BLOOMSBURG, PA 17815 SCOTT.J.RUBIN@GMAIL.COM TEL: (570) 387-1893 FAX: (570) 387-1894 CELL: (570) 850-9317

February 26, 2009

David S. Danner
Secretary and Executive Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250
By Overnight Delivery (FedEx)

Re: 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

Dear Mr. Danner:

Enclosed for filing please find the original and twelve (12) copies of the Motion to Withdraw of International Brotherhood of Electrical Workers, Local 89, in the above-referenced proceeding.

Electronic copies were filed with the WUTC Records Department on this date.

Sincerely,

Scott I Rubin

Enclosure

cc: per Certificate of Service

Dennis J. Moss, ALJ

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

MOTION TO WITHDRAW OF INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 89,

Pursuant to WAC § 480-07-380(3), International Brotherhood of Electrical Workers, Local 89 ("IBEW"), hereby moves to withdraw its intervention in this proceeding. In support of this Petition, IBEW states as follows:

- 1. IBEW petitioned to intervene in this proceeding on December 16, 2008, so that it could represent the interests of its members who are employees and customers of the Applicants.
- 2. Administrative Law Judge Moss granted IBEW's petition to intervene by order dated January 6, 2009.
- 3. In its Petition to Intervene, IBEW stated that it had not yet developed a position on the proposed transaction, but that it was concerned about the financial ability of CenturyTel to undertake this transaction, among other matters.
- 4. Since December when IBEW petitioned to intervene, it has received substantially more information about the proposed transaction. In addition, as part of the normal labor relations process, IBEW has engaged in discussions and negotiations with Embarq and CenturyTel on a nationwide basis.

5. As a result of this process, IBEW has determined that it is no longer necessary to participate in this proceeding in order to represent the interests of its members who are employed by the Applicants.

6. IBEW does not intend to file direct testimony on March 4, 2009, or to otherwise further participate in this matter.

WHEREFORE, IBEW respectfully requests the right to withdraw its intervention in this proceeding and to terminate any further activity therein.

Respectfully submitted,

Scott J. Rubin, Esq.

333 Oak Lane

Bloomsburg, PA 17815-2036

Phone: (570) 387-1893 Fax: (570) 387-1894

Email: scott.j.rubin@gmail.com

Counsel for

IBEW

Dated: February 26, 2009

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding by U.S. mail, postage prepaid, and electronic mail.

Charles L. Best 1631 NE Broadway, Suite 538 Portland, OR 97232-1425 chuck@charleslbest.com

Jonathan C. Thompson Office of Attorney General P.O. Box 40128 Olympia, WA 98504-0128 jthompso@wutc.wa.gov William E. Hendricks III Embarq 902 Wasco Street Hood River, OR 97031 tre.hendricks@embarq.com

Sarah A. Shifley Office of Attorney General 800 Fifth Avenue, Suite 2000 Seattle, WA 98104-3188 sarah.shifley@atg.wa.gov

Scott J. Rubih

Counsel for IBEW

Dated: February 26, 2009