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September 15, 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: Verizon Communications Inc. and Frontier
Communications Corp. for an Order Declining to
Assert Jurisdiction Over, or, in the Alternative,
Approving the Indirect Transfer of Control of
Verizon Northwest Inc., Docket UT-090842

Dear Mr. Danner:

Enclosed for filing please find the original of each of the following documents, filed on behalf of International Brotherhood of Electrical Workers, Local 89, in the above-referenced proceeding:

- Exhibit A, Agreement Concerning Confidential Information, signed by Scott J. Rubin
- Exhibit C, Agreement Concerning Highly Confidential Information, signed by Scott J. Rubin
- Exhibit B, Agreement Concerning Confidential Information, signed by Randy Barber
- Exhibit C, Agreement Concerning Highly Confidential Information, signed by Randy Barber

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

Sincerely,



Scott J. Rubin

Enclosure

cc: per Certificate of Service (electronic mail and first class mail)
Patricia Clark, ALJ (electronic mail and first class mail)

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.

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1800 41st St., WA0105GC
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gregory.m.romano@verizon.com

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Scott J. Rubin
Counsel for IBEW

Dated: September 15, 2009

EXHIBIT A (ATTORNEY AGREEMENT)

AGREEMENT CONCERNING CONFIDENTIAL INFORMATION
IN DOCKET UT-090842
BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Scott J. Rubin, as attorney in this proceeding for IBEW Local 89 (party to this proceeding) agree to comply with and be bound by the Protective Order entered by the Washington Utilities and Transportation Commission in Docket UT-090842, and acknowledge that I have reviewed the Protective Order and fully understand its terms and conditions.



Signature

September 14, 2009
Date

333 Oak Lane, Bloomsburg, PA 17815
Address

EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)

AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION
IN DOCKET UT-090842
BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Scott J. Rubin, as

- In-house attorney
- In-house expert
- Outside counsel
- Outside expert

in this proceeding for IBEW Local 89 (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the pricing, marketing, and sales of retail telecommunications services in the state of Washington, and
- b. I have read and understand, and agree to be bound by, the terms of the Protective Order in this proceeding, including this Section C of the Protective Order.



Signature

September 14, 2009
Date

Bloomsburg, PA
City/State where this Agreement was signed

Law Office of Scott J. Rubin

Employer

Attorney
Position and Responsibilities

333 Oak Lane, Bloomsburg, PA
Permanent Address

* * *

The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt. Failure to do so will constitute a waiver and the above-named person will be deemed a person having access to Highly Confidential Information under the terms and conditions of the protective order.

_____ No objection.

_____ Objection. The responding party objects to the above-named person having access to Highly Confidential Information. The objecting party shall file a motion with the Commission, supported by affidavit, setting forth the basis for objection and asking exclusion of the person from access to Highly Confidential Information.

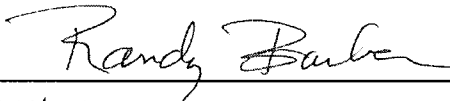
Signature

Date

EXHIBIT B (EXPERT AGREEMENT)

AGREEMENT CONCERNING CONFIDENTIAL INFORMATION
IN DOCKET UT-090842
BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Randy Barber, as expert witness in this proceeding for the International Brotherhood of Electrical Workers, Local 89, (a party to this proceeding) hereby agree to comply with and be bound by the Protective Order entered by the Washington Utilities and Transportation Commission in Docket UT-090842, and acknowledge that I have reviewed the Protective Order and fully understand its terms and conditions.



Signature

September 14, 2009

Date

Center for Economic Organizing

Employer

6935 Laurel Ave, #204, Takoma Park, MD 20912 President/Consultant

Address Position and Responsibilities

* * *

The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt; failure to do so will constitute a waiver and the above-named person will be deemed an expert having access to Confidential Information under the terms and conditions of the Protective Order.

_____ No objection.

_____ Objection. The responding party objects to the above-named expert having access to Confidential Information. The objecting party shall file a motion setting forth the basis for objection and asking exclusion of the expert from access to Confidential Information.

Signature

Date

EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)

AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION
IN DOCKET UT-090842
BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Randy Barber, as

- In-house attorney
- In-house expert
- Outside counsel
- Outside expert

in this proceeding for the International Brotherhood of Electrical Workers, Local 89, (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the pricing, marketing, and sales of retail telecommunications services in the state of Washington, and
- b. I have read and understand, and agree to be bound by, the terms of the Protective Order in this proceeding, including this Section C of the Protective Order.



Signature

September 14, 2009

Date

Takoma Park, Maryland

City/State where this Agreement was signed

Center for Economic Organizing

Employer

6935 Laurel Avenue, #204

President/Consultant _____

Takoma Park, MD 20912 _____

Position and Responsibilities

Permanent Address

* * *

The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt. Failure to do so will constitute a waiver and the above-named person will be deemed a person having access to Highly Confidential Information under the terms and conditions of the protective order.

_____ No objection.

_____ Objection. The responding party objects to the above-named person having access to Highly Confidential Information. The objecting party shall file a motion with the Commission, supported by affidavit, setting forth the basis for objection and asking exclusion of the person from access to Highly Confidential Information.

Signature

Date