

333 OAK LANE
BLOOMSBURG, PA 17815
SCOTT.J.RUBIN@GMAIL.COM

SCOTT J. RUBIN
ATTORNEY • CONSULTANT

TEL: (570) 387-1893
FAX: (570) 387-1894
CELL: (570) 850-9317

September 18, 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)

RECEIVED
RECORDS MANAGEMENT
2009 SEP 18 AM 11:42
STATE OF WASH
UTIL AND TRAN
COMMISSION

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 B, Agreement Concerning Confidential Information, signed by Susan Baldwin
- Exhibit C, Agreement Concerning Highly Confidential Information, signed by Susan Baldwin

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.

Gregory M. Romano
Verizon Northwest Inc.
1800 41st St., WA0105GC
Everett, WA 98201
gregory.m.romano@verizon.com

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

Kevin Saville
Frontier Communications Corp.
2378 Wilshire Blvd.
Mound, MN 55364
kevin.saville@frontiercorp.com

Jonathan C. Thompson
Office of Attorney General
P.O. Box 40128
Olympia, WA 98504-0128
jthomps@wutc.wa.gov

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

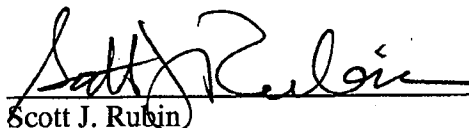
Gregory J. Kopta
Davis Wright Tremaine LLP
1201 Third Avenue, Suite 2200
Seattle, Washington 98101-3045
gregkopta@dwt.com

Mark P. Trincherro
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2300
Portland, OR 97201
marktrincherro@dwt.com

Lisa Rackner
McDowell & Rackner PC
520 SW Sixth Ave., Suite 830
Portland, OR 97204
lisa@mcd-law.com

Brooks Harlow / David Rice
Miller Nash
601 Union St.
Seattle, WA 98101-2352
brooks.harlow@millernash.com
david.rice@millernash.com

Stephen S. Melnikoff / Terrance A. Spann
Regulatory Law Office (JALS-RL)
U.S. Army Litigation Center
901 North Stuart Street, Suite 700
Arlington, Virginia 22203-1837
stephen.melnikoff@hqda.army.mil
terrance.spann@hqda.army.mil



Scott J. Rubin
Counsel for IBEW

Dated: September 18, 2009

EXHIBIT B (EXPERT AGREEMENT)

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

I, Susan Baldwin, as expert
witness in this proceeding for IBEW (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.

Susan Baldwin
Signature

9/18/09
Date

self-employed
Employer

17 Arlington St. Newburyport MA 01950
Address

Position and Responsibilities

consultant

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