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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
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2009 SEP 18 AM 11:43
STATE OF WASH.
UTIL. AND TRANSP.
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.

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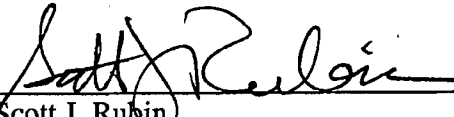
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Scott J. Rubin
Counsel for IBEW

Dated: September 18, 2009

EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)

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

I, Susan Baldwin, as

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

in this proceeding for _____ (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.

Susan Baldwin
Signature

9/18/09
Date

Newburyport, MA
City/State where this Agreement was signed

Employer *self-employed*

*17 Arlington Street
Newburyport MA
01950*

Consultant

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