

UT-250544

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**Communications  
Workers of America**  
AFL-CIO, CLC

501 Third Street, N.W.  
Washington, D.C. 20001-2797  
202/434-1100



August 6, 2025

Via Electronic Filing

Jeff Killip  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

RE: Petition to Intervene Docket UT-250544

Dear Mr. Killip:

Please find the Communications Workers of America, District 7's Petition to Intervene in the above-mentioned docket.

Sincerely,

Hooman Hedayati  
Sr. Strategic Research Associate for Telecommunications Policy  
Communications Workers of America  
501 3rd ST NW, Washington, DC 20001  
(202)434-1198  
hhedayati@cwa-union.org

**BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION**

In the Matter of the Application of

QWEST CORPORATION, d/b/a  
CenturyLink QC,

For an Order Authorizing the Transfer of  
Assets or a Determination That an Order  
Authorizing the Transfer Is Not Required

Docket No. UT - 250544

**PETITION TO INTERVENE**

Communications Workers of America, District 7 (“CWA”) hereby petitions the Commission for leave to intervene in the above-captioned proceeding, pursuant to WAC 480-07-355. In support of this request, the undersigned states:

**1. Petitioner’s Name and Contact Information.**

Petitioner’s name is Communications Workers of America, District 7. The name, address and telephone number of the person to whom communications should be addressed are:

Hooman Hedayati  
Communications Workers of America  
501 3rd ST NW, Washington, DC 20001  
(202)434-1198  
[hhedayati@cwa-union.org](mailto:hhedayati@cwa-union.org)

Jake Williams  
Communications Workers of America, District 7  
929 East Main St., Suite 240, Puyallup, WA 98372  
(253)878-3646  
[jwilliams@cwa-union.org](mailto:jwilliams@cwa-union.org)

**2. Petitioner’s Interest in this Proceeding.**

CWA represents approximately 4,350 workers at Lumen and 60,300 workers at AT&T. In Washington, CWA represents 223 employees at AT&T and 455 employees at Lumen.

This proceeding involves a proposed transfer of assets involving Lumen and AT&T, two of the largest telecommunications companies in the country. The structure of this transaction raises serious concerns for Lumen's workers and customers. CWA is concerned that Lumen will reduce service quality in the short term and abandon remaining customers in the long term by using the transaction to exit the residential broadband market.

The structure of this transaction also raises serious concerns for CWA members. Rather than transferring the residential fiber assets to AT&T, they are being sold to a new subsidiary that AT&T is calling "NetworkCo," which will then be partially sold to an as yet unnamed private equity partner. AT&T has not committed to respecting the collective bargaining agreements between CWA and Lumen for the small number of employees that are being transferred to AT&T. CWA is also concerned that the remaining workers at Lumen face the complete elimination of their good union jobs as Lumen exits the residential market in the next few years.

### 3. Name and Contact Information of Authorized Representatives.

CWA authorizes the following individuals to act as Petitioner's representatives in this proceeding:

Hooman Hedayati  
Sr. Strategic Research Associate for Telecommunications Policy  
Communications Workers of America  
501 3<sup>rd</sup> ST NW, Washington DC 20001  
(202)434-1198  
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Jake Williams  
Staff Representative District 7  
Communications Workers of America  
929 East Main St., Suite 240, Puyallup, WA 98372  
(253)878-3646  
jwilliams@cwa-union.org

### 4. Relief Requested.

CWA petitions the Commission for leave to intervene in the captioned proceeding as a party with full rights to participate in the proceeding, including the right to discovery, examine witnesses, file testimony and briefs, and be heard at oral argument. A grant of this petition will not delay the proceeding or unduly affect the rights of participating parties.

/s/ Hooman Hedayati  
Hooman Hedayati  
Sr. Strategic Research Associate for  
Telecommunications Policy  
Communications Workers of America  
501 3rd ST NW, Washington DC 20001  
(202)434-1198  
hhedayati@cwa-union.org July 10, 2025

August 6, 2025