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June 29, 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 and twelve (12) copies each of (1) the Petition to Intervene and (2) a Notice of Appearance filed on behalf of International Brotherhood of Electrical Workers, Local 89, in the above-referenced proceeding.

In addition, IBEW respectfully requests that the Prehearing Conference scheduled for July 7, 2009, be held telephonically. IBEW will be happy to provide a toll-free conference bridge line to facilitate such a telephonic prehearing conference.

Electronic copies of both 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 (overnight delivery)

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of	)	DOCKET UT-090842
	)	
VERIZON COMMUNICATIONS	)	
INC. AND FRONTIER	)	
COMMUNICATIONS	)	PETITION TO INTERVENE OF
CORPORATION	)	INTERNATIONAL BROTHERHOOD
	)	OF ELECTRICAL WORKERS,
For An Order Declining to Assert	)	LOCAL 89
Jurisdiction Over, or, in the Alternative,	)	
Approving the Indirect Transfer of	)	
Control of Verizon Northwest Inc.	)	
.....	)	

Pursuant to WAC 480-07-355, the International Brotherhood of Electrical Workers, Local 89 (“IBEW”) hereby petitions for leave to intervene in the above-captioned proceeding. In support of this Petition, IBEW states as follows:

1. The address of the petitioner is:

International Brotherhood of Electrical Workers, Local 89  
P.O. Box 2330  
Everett, Washington 98213

2. IBEW is a labor union representing the interests of approximately 1,300 employees of Verizon Northwest in the State of Washington. Many of the employees represented by IBEW also are customers of Verizon.

3. This proposed transfer of control and the decisions of this Commission with respect thereto are likely to have a direct and immediate impact on the people IBEW represents, both as employees and as customers of Verizon in Washington. The interests of Verizon’s employees will or may be adversely affected by this case. In particular, the proposed transaction would involve the transfer of Verizon’s employees to Frontier; but in order to finalize the transaction

Frontier will need to incur more than \$3 billion in new debt. In addition, Frontier would need to engage in a complex transition of hundreds of Verizon computer systems in another state (West Virginia) prior to closing the transaction; and Frontier plans to engage in a similar transition in Washington and 12 other states within two to three years after the transaction closes. Verizon employees, as represented by IBEW, are directly concerned with, and may be adversely affected by, the proposed transaction because it may have a serious adverse effect on the financial health of their employer.

4. The petitioner's position with respect to the matters in controversy will be determined after all evidence has been presented. At the outset, however, IBEW has serious questions about the financial fitness and capabilities of Frontier to engage in a transaction of this magnitude. IBEW also has serious questions about the technical and managerial fitness and capabilities of Frontier to manage and execute transitions of the magnitude and complexity required for the proposed transaction.

5. Petitioner intends to address the issues discussed above, but this does not constitute a broadening of the issues in the proceeding. It is customary for the Commission to determine whether the proposed new owner of a public utility has the requisite financial, managerial, and technical fitness to own and operate a utility in Washington.

6. IBEW will be represented by, and all documents should be served upon, its attorney:

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7. IBEW respectfully requests that the Prehearing Conference scheduled for July 7, 2009, be held telephonically. IBEW will be happy to provide a toll-free conference bridge line to facilitate such a telephonic prehearing conference.

WHEREFORE, International Brotherhood of Electrical Workers, Local 89, respectfully requests permission to intervene in this proceeding.



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Counsel for IBEW

Dated: June 29, 2009

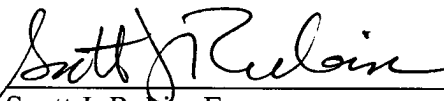
**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of	)	DOCKET UT-090842
	)	
VERIZON COMMUNICATIONS	)	
INC. AND FRONTIER	)	
COMMUNICATIONS	)	NOTICE OF APPEARANCE
CORPORATION	)	
	)	
For An Order Declining to Assert	)	
Jurisdiction Over, or, in the Alternative,	)	
Approving the Indirect Transfer of	)	
Control of Verizon Northwest Inc.	)	
	)	
.....	)	

Pursuant to WAC § 480-07-345, please enter the appearance of the undersigned as counsel for International Brotherhood of Electrical Workers, Local 89 (“IBEW”), in the above-captioned proceeding.

The undersigned is an attorney admitted to practice and in good standing before the Supreme Court of Pennsylvania and the Court of Appeals of New York, and has practiced as an attorney in utility regulatory matters for more than 25 years.

IBEW requests that all documents be served on its undersigned counsel as the person authorized to accept service on its behalf in this proceeding.

  
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Email: scott.j.rubin@gmail.com

Counsel for IBEW

Dated: June 29, 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.

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Dated: June 29, 2009