SCOTT J. RUBIN

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

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

July 2, 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 the Motion of International Brotherhood of Electrical Workers, Local 89, for Permission to Reply to Answer of Frontier and Verizon in the above-referenced proceeding. Attached to the Motion as Attachment A is the Proposed Reply.

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 overnight delivery)