

BEFORE THE PUBLIC UTILITY COMMISSION

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OF OREGON

2009 JUN 15 A 8:48

Docket No. UM-1431

P.U.C.

In the Matter of )  
 Joint Application of Verizon )  
 Communications Inc. and Frontier )  
 Communications Corp. Concerning the )  
 Indirect Transfer of Control of Verizon )  
 Northwest Inc. )

PETITION TO INTERVENE

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JUN 15 2009

Public Utility Commission of Oregon  
Administrative Hearing Division

|                     |   |
|---------------------|---|
| NAME OF PETITIONER: | International Brotherhood of Electrical Workers, Local 89 |
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|                                 |  |
|---------------------------------|--|
| NAME OF COUNSEL FOR PETITIONER: |  |
| COUNSEL'S ADDRESS:              |  |
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| <p>IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:</p> <p>Petitioner is a labor union representing the interests of approximately 454 employees of Verizon Northwest in the State of Oregon. Many of the employees represented by IBEW also are customers of Verizon.</p> |
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**NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:**

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 Oregon. 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 Oregon 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.

**THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:**

IBEW has serious questions about the financial fitness and capabilities of Frontier to engage in a transaction of this magnitude, and it intends to provide the testimony of one or more expert witnesses to address the financial fitness and capabilities of Frontier, including any conditions that may be necessary to protect the public from the potentially serious adverse consequences of having a utility that may lack the necessary financial capability to adequately operate, maintain, and improve utility service in Oregon. 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. IBEW intends to provide the testimony of one or more expert witnesses to address the financial and managerial fitness and capabilities of Frontier, including any conditions that may be necessary to protect the public from the potentially serious adverse consequences of the transition process.

**ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:**

IBEW will bring a unique perspective to this proceeding. IBEW has access to hundreds of Verizon employees who have first-hand knowledge of Verizon's operations in Oregon. In addition, IBEW will be participating in parallel regulatory proceedings in other states and before the Federal Communications Commission involving the proposed transaction. Moreover, IBEW affiliates in other states have been through similar types of transactions in recent years. Thus, IBEW may have access to information that might not otherwise be available to parties in Oregon. Finally, the expert witnesses who will be retained by IBEW are expected to have extensive expertise participating in and/or analyzing these types of transactions.

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-012-0001.

  
\_\_\_\_\_  
Petitioner or Petitioner's Representative

\_\_\_\_\_  
Date

LOCAL UNION NO. 89  
International Brotherhood of Electrical Workers

June 16, 2009

Ms. Frances Nichols  
Oregon Public Utility Commission  
550 Capitol Street NE, Suite 215  
Salem, Oregon 97308-2148

Re: UM 1431, Tracking No. 9147

Dear Ms. Nicholls:

This is my Certificate of Service for UM 1431. I hereby certify on June 12, 2009 a Petition to Intervene signed by Ray Egelhoff was mailed to the Oregon Public Utility Commission. Also, on June 16, 2009 I certify that a copy of this Petition to Intervene was distributed upon all parties of record in this proceeding by delivering a copy by first class postage prepaid pursuant to OAR 860-013-0070, to the members of the distribution list attached.

Sincerely,

*Ray Egelhoff*

Ray Egelhoff  
Business Manager  
Financial Secretary  
Local 89, I.B.E.W.

RE:pj  
opeiu#8  
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