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2
3 **BEFORE THE PUBLIC UTILITY COMMISSION**
4 **OF OREGON**
5 **UM 1484**

6 In the Matter of
7 CENTURYLINK, INC.,
8 Application for Approval of Merger between
9 CenturyTel, Inc., and Qwest Communications
10 International, Inc.

PETITION TO INTERVENE
& WAIVER OF PAPER SERVICE OF
TELECOMMUNICATIONS RATEPAYERS
ASSOCIATION FOR COST-BASED AND
EQUITABLE RATES

11 The Telecommunications Ratepayers Association for Cost-based and Equitable Rates
12 (“TRACER”) respectfully petitions to intervene in this proceeding and gives notice of its intent
13 to participate as a full party.

14 In support of this petition, TRACER states as follows:

- 15 1. The name and address of the petitioner is:

16 TRACER Oregon
17 1331 NW Lovejoy Street, Suite 900
18 Portland, OR 97209-3280

- 19 2. The name and addresses of the attorneys representing the petitioner are:

20 Arthur A. Butler (*pro hac vice*)
21 Ater Wynne LLP
22 601 Union Street, Suite 1501
23 Seattle, WA 98101-3981
24 aab@aterwynne.com
25 Phone: 206.623.4711
Fax: 206.467.8406

1 Joel R. Paisner
2 Ater Wynne LLP
3 601 Union Street, Suite 1501
4 Seattle, WA 98101-3981
5 jrp@aterwynne.com
6 Phone: 206.623.4711
7 Fax: 206.467.8406

8 3. TRACER is a coalition representing entities that are large users of
9 telecommunications services in the State of Oregon.

10 4. TRACER members are large customers of Qwest in Oregon. As their
11 representative, TRACER has knowledge and expertise that will assist the Commission and the
12 parties in resolving the issues presented in this proceeding.

13 5. The participation of TRACER in this proceeding will not unduly broaden the
14 issues or burden the record.

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

19 RESPECTFULLY SUBMITTED this 4th day of June, 2010.

20 ATER WYNNE LLP

21 By:



22 Arthur A. Butler WSBA #: 04678 (*pro hac vice*)
23 Joel R. Paisner OSB # 100580
24 601 Union Street, Suite 1501
25 Seattle, WA 98101-3981
Telephone: (206) 623-4711
Facsimile: (206) 467-8406
E-mail: aab@aterwynne.com
Attorneys for TRACER

CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of June, 2010, served the foregoing along with the correct number of copies, of the foregoing PETITION TO INTERVENE & WAIVER OF PAPER SERVICE OF TELECOMMUNICATIONS RATEPAYERS ASSOCIATION FOR COST-BASED AND EQUITABLE RATES in docket UM 1484 upon each party listed in the UM 1484 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending 2 copies by U.S. mail, postage prepaid to the Commission's Salem offices.

On Behalf Of United Telephone Company of the Northwest

Barbara Young
United Telephone Company of the Northwest
ORHDRA0305
902 Wasco Street
Hood River OR 97031-3105

- Hand Delivered
- U.S. Mail (first-class, postage prepaid)
- Overnight Mail (UPS)
- Facsimile (541) 387-9753
- Email
- (barbara.c.young@mail.sprint.com)

Confidentiality Status:

On Behalf Of Qwest Corporation

Alex M. Duarte
Qwest Corporation
Suite 810
421 SW Oak Street
Portland OR 97204

- Hand Delivered
- U.S. Mail (first-class, postage prepaid)
- Overnight Mail (UPS)
- Facsimile (503) 242-8589
- Email (alex.duarte@qwest.com)

Confidentiality Status:

On Behalf Of CenturyLink

William E. Hendricks III
CenturyLink
805 Broadway Street
Vancouver WA 98660-3277

- Hand Delivered
- U.S. Mail (first-class, postage prepaid)
- Overnight Mail (UPS)
- Facsimile
- Email (tre.hendricks@embarq.com)

Confidentiality Status:

On Behalf Of Qwest Corporation

Mark S. Reynolds
Qwest Corporation
Room 3206
1600 7th Avenue
Seattle WA 98191

- Hand Delivered
- U.S. Mail (first-class, postage prepaid)
- Overnight Mail (UPS)
- Facsimile (206) 346-7289
- Email (mark.reynolds3@qwest.com)

Confidentiality Status:

1 **On Behalf Of Oregon Public Utility Commission**

2 Bryan Conway
3 Oregon Public Utility Commission
4 PO Box 2148
5 Salem OR 97308-2148

6 *Confidentiality Status:*

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 373-7752
 Email (bryan.conway@state.or.us)

7 **On Behalf Of Oregon Department of Justice**

8 Jason W. Jones
9 Oregon Department of Justice
10 1162 Court Street NE
11 Salem OR 97301-4096

12 *Confidentiality Status:*

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile
 Email (jason.w.jones@state.or.us)

13 **On Behalf Of Citizens' Utility Board of Oregon**

14 Robert Jenks
15 Citizens' Utility Board of Oregon
16 Suite 308
17 610 SW Broadway
18 Portland OR 97205

19 *Confidentiality Status:*

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 274-2956
 Email (bob@oregoncub.org)

20 **On Behalf Of CenturyLink:**

21 Charles L. Best
22 Suite 538
23 1631 NE Broadway
24 Portland OR 97232-1425

25 *Confidentiality Status:*

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile
 Email (chuck@charleslbest.com)

26 **On Behalf Of Citizens' Utility Board of Oregon**

27 Gordon Feighner
28 Citizens' Utility Board of Oregon
29 Suite 308
30 610 SW Broadway
31 Portland OR 97205

32 *Confidentiality Status:*

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 274-2956
 Email (gordon@oregoncub.org)

1 **On Behalf Of Citizens' Utility Board of Oregon**

2 Kevin Elliott Parks
3 Citizens' Utility Board of Oregon
4 Suite 308
610 SW Broadway
Portland OR 97205

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 274-2956
 Email (kevin@oregoncub.org)

5 *Confidentiality Status:*

6 **On Behalf Of Citizens' Utility Board of Oregon**

7 G. Catriona McCracken
8 Citizens' Utility Board of Oregon
9 Suite 308
610 SW Broadway
Portland OR 97205

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 274-2956
 Email (catriona@oregoncub.org)

10 *Confidentiality Status:*

11 **On Behalf Of Citizens' Utility Board of Oregon**

12 Raymond Myers
13 Citizens' Utility Board of Oregon
14 Suite 308
610 SW Broadway
Portland OR 97205

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 274-2956
 Email (ray@oregoncub.org)

15 *Confidentiality Status:*

16 **On Behalf Of Oregon Public Utility Commission**


17 Michael Dougherty
18 Public Utility Commission of Oregon
PO Box 2148
Salem OR 97301

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile
 Email (michael.dougherty@state.or.us)

19 *Confidentiality Status:*

20 I declare under penalty of perjury under the laws of the State of Washington that the
21 foregoing is true and correct.

22 DATED this 4th day of June, 2010, at Seattle, Washington.

23 
24 _____
25