



June 21, 2010

VIA ELECTRONIC FILING AND FEDERAL EXPRESS

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol Street NE #215
P.O. Box 2148
Salem, OR 97308-2148

Re: CenturyTel, Inc.
Docket No. UM-1484

Dear Filing Center:

Enclosed for filing are an original and one copy of 360networks (USA) inc.'s Petition for Intervention in the above-referenced docket.

A copy of this filing has been served on all parties to this proceeding pursuant to the attached certificate of service.

Very truly yours,

/s/ Michel Singer Nelson

Michel Singer Nelson
Associate General Counsel
360networks (USA) inc.

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3
4 UM1484

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6 In the Matter of)
7 CENTURYLINK, INC.)
8) **360networks (USA) inc.'s**
9 Application for Approval of Merger between) **Petition for Intervention**
10 CenturyTel, Inc. and Qwest Communications)
11 International, Inc.)

12 _____
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15 Pursuant to ORS 75625 and OAR 860-012-001, 360networks (USA) inc. ("360networks")
16 respectfully petitions the Public Utility Commission of Oregon (the "Commission") for leave to intervene in
17 the above-captioned proceeding with full party status as described in OAR 860-011-0035(7). In support
18 of this petition 360networks states as follows:

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20 1.

21 The name and address of the Company are:

22
23 360networks (USA) inc.
24 370 Interlocken Blvd., Suite 600
25 Broomfield, Colorado 80021

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27 2.

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29 360networks wishes to waive paper service in this docket. All correspondence in this matter
30 should be directed to:

31
32 **360NETWORKS (USA) INC.**
33 MICHEL SINGER NELSON
34 370 INTERLOCKEN BLVD. STE.600
35 BROOMFIELD, COLORADO 80021

36
37 **360NETWORKS (USA) INC.**
38 PENNY STANLEY
39 370 INTERLOCKEN BLVD. STE.600
40 BROOMFIELD, COLORADO 80021

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42 3.

43 360networks is a registered and competitively classified telecommunications company authorized
44 to provide both interexchange and intraexchange telecommunications services throughout Oregon.
360networks currently competes with, and obtains interconnection and related services and facilities from
both Qwest Communications International, Inc. ¹("Qwest") and CenturyLink, Inc. ² ("CenturyLink") in the
provision of 360networks' telecommunications services. 360networks maintains local interconnection
agreements with Qwest and CenturyLink in their capacity as incumbent local exchange carriers, entered

¹ 360networks has an Oregon Interconnection Agreement with Qwest Corporation, a subsidiary of Qwest
Communications International

² 360networks has two Oregon Interconnection Agreements with CenturyTel, Inc.

1 into pursuant to sections 251 and 252 of the Communications Act of 1934 as amended by the
2 Telecommunications Act of 1996, Pub. L. 104-104, 110 Stat. 56, 47 U.S.C. Sections 151 *et seq.*

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4 4.

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6 360networks has a substantial interest in the proposed transfer control of Qwest to CenturyLink.
7 360networks relies on interconnection with and related services and facilities obtained from Qwest and
8 CenturyLink to offer and provide service to 360networks' customers in the Qwest and CenturyLink service
9 territories. 360networks seeks to participate in this proceeding to ensure that the proposed transaction
10 will not adversely impact competition in Oregon or 360networks' rights and ability to obtain the
11 interconnection and related services and facilities it needs to provide its telecommunications services.

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13 5.

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15 The evidence, if any, and briefing presented by 360networks will be of material value to the
16 Commission in its determination of the issues involved in this proceeding, and 360networks' intervention
17 will not broaden those issues or delay the proceedings.

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19 CONCLUSION

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21 For all of the above reasons, 360networks' Petition to Intervene should be granted.

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25 DATED: June 21, 2010

360NETWORKS (USA) INC.

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28 /s/ Michel Singer Nelson

29
30 _____
31 Michel Singer Nelson
32 Associate General Counsel
33 360networks (USA) inc.

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1484 on the following named person(s) on the date indicated below by email and U.S. Mail address to said person(s) at his or her last-known address(es) indicted below.

Alex M. Duarte
Qwest Corporation
421 SW Oak St. Ste. 810
Portland, OR 97204
Alex.duarte@qwest.com

Mark Reynolds
Qwest Corporation
1600 7th Ave. Room 3206
Seattle, WA 98191
mark.reynolds@qwest.com

Charles L. Best
chuck@charlesbest.com

William E. Hendricks
CenturyLink, Inc.
Tre.hendricks@centurylink.com

Robert Jenks
Citizens Utility Board of Oregon
bob@oregoncub.org

Raymond Myers
Citizens Utility Board of Oregon
ray@oregoncub.org

Gordon Feighner
Citizens Utility Board of Oregon
Gordon@oregoncub.org

G. Catriona McCracken
Citizens Utility Board of Oregon
catriona@oregoncub.org

Kevin E. Parks
Citizens Utility Board of Oregon
kevin@oregoncub.org

Jason Jones
Department of Justice
Assistant Attorney General
jason.w.jones@state.or.us

Michael Dougherty
Oregon Public Utility Commissioner
michael.dougherty@state.or.us

Barbara Young
United Telephone Company
of the Northwest
barbara.c.young@centurylink.com

Mark Trincherro
Davis Wright Tremaine LLP
1300 SW 5th Ave., Ste. 2300
Portland, OR 97201-5682
marktrincherro@dwt.com

Marsha Spellman
Converge Communications
10425 SW Broadway, Ste. 308
Portland, OR 97225
marsha@convergecomm.com

Katherine K. Mudge
Director, State Affairs & ILEC Relations
7000 N. Mopacc Expwy, 2nd Floor
Austin, TX 78731
kmudge@covad.com

Lyndall Nipps
VP, Regulatory Affairs
845 Camino Sur
Palm Springs, CA 92262-4157
lyndall.nipps@twtelcom.com

Adam Haas
WSTC
10425 SW Hawthorne LN
Portland, OR 97225
adam.haas@convergecom.com

Rex M. Knowles
XO Communications
7050 Union Park Avenue, Ste. 400
Midvale, UT 84047
rex.knowles@xo.com

/s/ Penny Stanley

Dated: June 21, 2010

Penny Stanley
360networks (USA) inc.

