#### CARNEY, BUCKLEY, HAYS & MARSH

JEROME B. BUCKLEY, JR. PAUL C. HAYS JAMES O. MARSH PING TOW-WORAM ATTORNEYS AT LAW Suite 1015 1500 S.W. First Avenue Portland, Oregon 97201

RICHARD R. CARNEY

Telephone: 503-221-0611 Fax: 503-221-1675

June 24, 2009

via electronic mail and UPS Overnight Delivery

ATTN: Filing Center Public Utilities Commission of Oregon 550 Capitol Street N.E., Suite 215 Salem, OR 97301-2551

Re:

Joint Application of Verizon Communications, Inc. and

Frontier Communications Corporation for an Order Declining to Assert Jurisdiction Over, or, in the Alternative, Approving the Indirect Transfer of Control of Verizon Northwest, Inc.;

UM1431

Dear Filing Center:

Enclosed for filing is the original and one copy of a Notice of Appearance of Paul C. Hays, appearing on behalf of and for International Brotherhood of Electrical Workers Local 89. Also, attached is correspondence from IBEW Local 89 Business Manager / Financial Secretary authorizing Paul C. Hays and Scott J. Rubin to represent Local 89 in this matter.

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Very truly yours,

CARNEY, BUCKLEY, HAYS & MARSH

PCH:mp Enclosure

cc:

Scott J. Rubin (w/enc) (via fax) Ray Egelhoff (w/enc) (via fax)

## BEFORE THE PUBLIC UTILITY COMMISSION

#### OF OREGON

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| In the Matter of                              | )    | NOTICE OF APPEARANCE OF   |
|   | )    | PAUL C. HAYS AS LOCAL     |
| THE PUBLIC UTILITY COMMISSION OF              | )    | COUNSEL FOR INTERNATIONAL |
| OREGON  | )    | BROTHERHOOD OF ELECTRICAL |
|   | )    | WORKERS LOCAL 89          |
| Joint Application of Verizon Communications,  | )    |                           |
| Inc. and Frontier Communications Corporation  | )    |                           |
| for an Order Declining to Assert Jurisdiction | )    |                           |
| Over, or, in the Alternative, Approving the   | )    |                           |
| Indirect Transfer of Control of Verizon       | )    |                           |
| Northwest, Inc.; UM1431                       | )    |                           |
|   | )    |                           |

Notice to all parties and participants:

Paul C. Hays hereby appears on behalf of and for International Brotherhood of Electrical Workers Local 89 as its Oregon counsel.

Attached hereto is a June 24, 2009 letter from Ray Egelhoff authorizing Paul C. Hays and Scott J. Rubin to represent Local 89 in this matter.

Dated this 2 day of June, 2009.

Respectfully submitted,

Paul C. Hays, OSB No. 751531

Carney, Buckley, Hays & Marsh

1500 S.W. First Avenue, Suite 1015

Portland, OR 97201

503-221-0611

pchayslaw@comast.net

UM 1431 NOTICE OF APPEARANCE OF PAUL C. HAYS AS LOCAL COUNSEL FOR INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 89



# LOCAL UNION NO. 89

International Brotherhood of Electrical Workers

P.O. Box 2330 • Everett, WA • 98213-0330 425/259-7101 • Fax 425/339-8899

Raymond A. Egelhoff Business Manager

June 23, 2009

and U.S. Mail

VIA FAX 503-378-6163

Matthew P. Carroll
President

Administrative Law Judge Allan Arlo Administrative Hearings Division 550 Capitol Street N.E. P O Box 248 Salem, OR 97308-2148

Re:

IBEW Local 89 Authorization of Representatives /

Verizon Northwest, Inc. / Frontier Communications Merger UM 1431

Dear Administrative Law Judge Arlo:

Pursuant to 860-012-0007(2)(a), please be informed that IBEW Local 89 has authorized the following attorneys to represent it in the above-noted matter.

Paul C. Hays, OSB No. 751531 Carney, Buckley, Hays & Marsh 1500 S.W. First Avenue, Suite 1015 Portland, OR 97201 503-221-0611 503-221-1675 (fax) pchayslaw@comcast.net

Mr. Hays shall serve as local counsel.

Scott Rubin
Attorney / Consultant
333 Oaklane
Bloomsburg, PA 17815
503-387-1893
scott@publicutilityhome.com

Mr. Rubin will appear pro hoc vice.

to 1/3

Respectfully submitt

Ray Egelhoff

Manager /Financial Secretary

IBEW Local 89



# UM 1431 CERTIFICATE OF SERVICE

I hereby certify that I have this day served the Notice of Appearance of Paul C. Hays and attachments upon all of the following parties, as follows:

## **Public Utilities Commission of Oregon**

Attention: Filing Center
550 Capitol Street N.E., Suite 215
Salem, OR 97301-2551
VIA UPS & EMAIL

#### Charles L. Best

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#### Michael T. Weirich

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#### **Bob Jenks**

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## Gregory J. Kopta

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#### **Andrew Fisher**

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VIA EMAIL ONLY

Eugene M. Eng

Verizon Northwest, Inc. Suite 150 MC OR030156 20575 N.W. Von Neumann Drive Hillsboro, OR 97006 eugene.eng@verizon.com

VIA EMAIL ONLY

DATED: June \_\_\_\_\_, 2009

Gregory M. Romano

General Counsel - N.W. Region 1800 41st Street Mc WA0105GC Everett, WA 98201 gregory.m.romano@verizon.com

VIA EMAILONLY