

June 12, 2009

**VIA Email and UPS Next Day**

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

RE: *In the Matter of the Joint Application of Verizon Communications Inc. and Frontier Communications Corporation for an Order Declining to Asset Jurisdiction Over, or, in the alternative, Approving the Indirect Transfer of Control of Verizon Northwest Inc.*  
UM 1431

Dear Ms. Nichols:

Enclosed for filing in Docket UM 1431 is a Motion to Admit Counsel *Pro Hac Vice*, including the Affidavit of Gregory J. Kopta and a Status Certificate from the State of Washington. Also attached for filing is a Petition to Intervene of Comcast Phone of Oregon, LLC and the Certificate of Service.

Very truly yours,

Davis Wright Tremaine LLP



Mark Trincherro

MPT:bl  
Encls.

DWT 12982144v1 0050033-004795

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1431**

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In the Matter of	)	
	)	
	)	<b>PETITION TO INTERVENE</b>
VERIZON COMMUNICATIONS, INC.,	)	
and FRONTIER COMMUNICATIONS	)	
CORPORATION	)	
	)	
Joint Application for an Order Declining to	)	
Assert Jurisdiction, or, in the alternative, to	)	
Approve the Indirect Transfer of Control of	)	
VERIZON NORTHWEST, INC.	)	

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**PETITION TO INTERVENE OF  
Comcast Phone of Oregon, LLC**

Comcast Phone of Oregon, LLC (“Comcast”) respectfully petitions the Commission for leave to intervene in the above-captioned proceeding.

In support of its petition, Comcast states as follows:

I.

Comcast’s name and address are:

Comcast Phone of Oregon, LLC  
One Comcast Center  
Philadelphia, PA 19103

## II.

All correspondence in this matter should be directed to:

Gregory J. Kopta  
DAVIS WRIGHT TREMAINE LLP  
1201 Third Ave., Suite 2200  
Seattle, WA 98101-1688  
Voice: (206) 628-7692  
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Andrew Fisher  
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Email: [Andrew\\_Fisher@Comcast.com](mailto:Andrew_Fisher@Comcast.com)

## III.

Comcast has a substantial interest in the proposed transfer of control of Verizon Northwest Inc. (“Verizon”) to Frontier Communications Corporation (“Frontier”). Comcast is a facilities-based provider of telecommunications services in Oregon and is authorized to provide such services in the areas in which Verizon is the incumbent local exchange carrier (“ILEC”). Verizon is the second largest ILEC in Oregon, and interconnection with Verizon is vital to Comcast’s ability to provide service to customers in Verizon’s service territory. Comcast seeks to ensure that the proposed transaction will not adversely impact competition or Comcast’s right or ability to obtain the interconnection and related services and facilities it needs to provide its telecommunications services. Comcast therefore submits this Petition to Intervene because it is materially interested in, and will be substantially affected by, the Commission’s resolution of the issues presented in this proceeding.

## IV.

Comcast expects to participate in the docket and to contribute to the Commission’s review of the proposed transaction its perspective as a competing telecommunications service provider and customer. Comcast will address such issues as it deems relevant in this proceeding.

IV.

Comcast has knowledge and expertise that will assist the Commission and the parties in addressing the issues presented in this proceeding.

V.

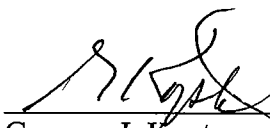
Comcast's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

### CONCLUSION

Comcast's Petition to Intervene should be granted.

DATED this 12<sup>th</sup> day of June 2009.

DAVIS WRIGHT TREMAINE LLP



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Attorneys for Comcast Phone of Oregon, LLC

CERTIFICATE OF SERVICE

UM 1431

I hereby certify on this 12<sup>th</sup> day of June, 2009, a Motion to Admit Counsel *Pro Hac Vice*, Affidavit of Gregory J. Kopta, Status Certificate from the State of Washington and a Petition to Intervene signed by Mark P. Trincherro on behalf of Comcast Phone of Oregon, LLC was sent via UPS overnight mail to the Oregon Public Utility Commission. A copy of the filing was sent electronically to the service list below:

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By: 