

# McDowell & Rackner PC



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June 30, 2009

## VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

**Re: Docket No. UM 1431**

Enclosed for filing in the above-referenced docket are an original and one copy of Level 3 Communications' Petition for Intervention.

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

Very truly yours,

  
Wendy L. McIndoo

cc: Service List

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**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the foregoing document in UM 1423 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

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DATED: June 30, 2009.

  
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Wendy McIndoo  
Legal Assistant

Of Attorneys for Level 3 Communications, LLC

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1431**

In the Matter of the 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.

**LEVEL 3 COMMUNICATIONS, LLC'S  
PETITION FOR INTERVENTION**

Pursuant to ORS 756.525 and OAR 860-012-001, Level 3 Communications, LLC  
("Level 3") respectfully petitions the Public Utility Commission of Oregon (the "Commission")  
for leave to intervene in the above-captioned proceeding with full party status as described  
in OAR 860-011-0035. In support of this petition, Level 3 states as follows:

1.

The name and address of the Company are:

Level 3 Communications, LLC  
1025 Eldorado Boulevard  
Broomfield, CO 80021

2.

Level 3 wishes to waive paper service in this docket. All correspondence in this  
matter should be directed to:

**LEVEL 3 COMMUNICATIONS, LLC**  
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1025 Eldorado Boulevard  
Broomfield, CO 80021  
Telephone: (720) 888-2512  
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**McDOWELL & RACKNER PC**  
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3.

2 Level 3 is a registered and competitively classified telecommunications company  
3 authorized to provide both intraexchange and interexchange telecommunications services  
4 throughout Oregon. Level 3 currently competes with, and obtains interconnection and  
5 related services and facilities from, Verizon Northwest Inc. ("Verizon") in the provision of  
6 Level 3's telecommunications services. And, Level 3 maintains local interconnection  
7 agreements with Verizon in its capacity as an incumbent local exchange carrier, entered into  
8 pursuant to sections 251 and 252 of the Communications Act of 1934, as Amended by the  
9 Telecommunications Act of 1996, Pub. L. 104-104, 110 Stat. 56, 47 U.S.C. Sections 151 *et*.  
10 *seq.* (the Act" or "1996 Act").

11

4.

12 Level 3 has a substantial interest in the proposed transfer of control of Verizon to  
13 Frontier Communications Corporation ("Frontier"). Verizon is the second largest incumbent  
14 local exchange carrier in Oregon. Level 3 relies on interconnection with, and related  
15 services and facilities obtained from, Verizon to offer and provide service to Level 3's  
16 customers in Verizon's service territory. Level 3 seeks to participate in this proceeding to  
17 ensure that the proposed transaction will not adversely impact competition in Oregon or  
18 Level 3's rights and ability to obtain the interconnection and related services and facilities it  
19 needs to provide its telecommunications services.

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21 The evidence, if any, and briefing presented by Level 3 will be of material value to  
22 the Commission in its determination of the issues involved in this proceeding, and Level 3's  
23 intervention will not broaden those issues or delay the proceedings.

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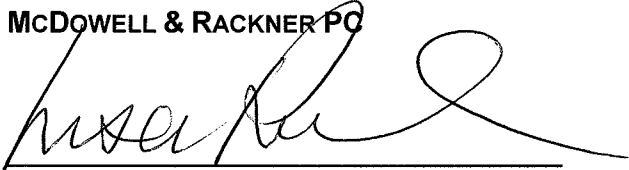
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**CONCLUSION**

For all of the above reasons, Level 3's Petition to Intervene should be granted.

DATED: 6/30/09

**MCDOWELL & RACKNER PC**



Lisa F. Rackner

**LEVEL 3 COMMUNICATIONS, LLC**

Greg Rogers  
1025 Eldorado Boulevard  
Broomfield, CO 80021

Of Attorneys for Level 3  
Communications, LLC