

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1451

In the Matter of the Application of Malheur
Home Telephone Company for an Order
Approving Transaction, and Request for
Expedited Consideration

PETITION TO INTERVENE BY QWEST
CORPORATION

Pursuant to OAR 860-013-0021, Qwest Corporation (“Qwest”) submits this Petition to
Intervene in the above-referenced docket.

I. Name and Address of Petitioner

Qwest Corporation
421 SW Oak Street
Portland, Oregon 97204

II. Name and Address of Petitioner's Attorney and Representative

Petitioner will be represented in these proceedings by the following attorney:

Alex M. Duarte, OSB No. 020459
Corporate Counsel
QWEST
421 SW Oak Street, Suite 810
Portland, Oregon 97204
(503) 242-5623 (telephone)
(503) 242-8589 (facsimile)
Alex.Duarte@qwest.com

In addition, Qwest requests the following representative on the service list:

Mark Reynolds
Regulatory Director- Oregon
QWEST
1600 7th Ave, 3206
Seattle WA 98191-0000
206-345-1568 (telephone)
206-206 343 4040 (facsimile)
Mark.Reynolds3@qwest.com

Qwest, notes, however, that both of these individuals are already on the docket's service list because they also represent the applicant, Malheur Home Telephone Company.

III. Nature and Extent of Petitioner's Interest in This Proceeding

This docket is an application by Qwest's wholly-owned subsidiary, Malheur Home Telephone Company ("Malheur Bell"), for an order, pursuant to ORS 759.375 and OAR 860-027-0025, approving an intra-corporate transaction in which Malheur Bell is consolidated with its parent company, Qwest. Malheur Bell has requested expedited consideration so that the transaction can be completed by its due date, December 14, 2009.

As was noted in Malheur Bell's September 4, 2009 application, Qwest did not join as a formal applicant for the intra-corporate transaction because neither ORS 759.375 nor ORS 759.380 apply to Qwest due to the Commission's approval of Qwest's price plan in Order No. 08-408 in docket UM 1354, which included the waiver of those statutes as to Qwest.

Nevertheless, Qwest seeks intervenor status so that it can become a full party to this docket, and as a party, it will respond to all relevant discovery, and further, it will agree to abide by and comply with any reasonable conditions that the Commission may impose on this transaction. As the corporate parent of Malheur Bell, and the company that will be the surviving entity after the consolidation is completed, Qwest clearly has a sufficient interest in this proceeding.

Qwest intends to address or comment on various issues, and will respond to data requests. Further, as mentioned, Qwest agrees to be bound by the Commission's order in this docket and any reasonable conditions in such order. Qwest has knowledge and experience that will assist the Commission and the parties in addressing the issues presented in this proceeding. Finally, Qwest's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

Thus, Qwest respectfully requests the Commission grant its Petition to Intervene in this docket with all of the rights afforded a full party under Oregon law and the Commission's rules.

DATED: September 17, 2009

Respectfully submitted

QWEST CORPORATION

A handwritten signature in black ink, appearing to read 'Alex M. Duarte', is written over a light gray rectangular background.

Alex M. Duarte, OSB No. 02045
421 SW Oak Street, Room 810
Portland, Oregon 97204
(503) 242-5623 (telephone)
(503) 242-7234 (facsimile)

Attorney for Qwest Corporation

CERTIFICATE OF SERVICE

UM 1451

I hereby certify that on the 17th day of September 2009, I served the foregoing **QWEST CORPORATION'S PETITION TO INTERVENE** in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at their regular office address shown below, and deposited in the U.S. post office at Portland, Oregon.

Michael T. Weirich, Esq.
Department of Justice
1162 Court St. NE, Room 100
Salem, OR 97301

Larry Reichman
Perkins Coie, LLP
1120 N.W. Couch St.
10th Floor
Portland, OR 97209-4128

Mark Reynolds
Qwest Corporation
1600 7th Ave., Room 3206
Seattle, WA 98191

David Gabica
Malheur Home Telephone Co.
P.O. Box 249
Ontario, Oregon 97914

Kay Marinos
Oregon Public Utility Commission
P.O. Box 2148
Salem, OR 97308

DATED this 17th day of September, 2009.

QWEST CORPORATION



By: _____

ALEX M. DUARTE, OSB No. 02045
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Carla M. Butler
Lead Paralegal

September 17, 2009

Frances Nichols-Anglin
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: UM-1451

Dear Ms. Nichols-Anglin:

Enclosed for filing please find an original and (5) copies of Qwest Corporation's Petition to Intervene, along with a certificate of service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Carla". The signature is written in a cursive, flowing style.

Carla M. Butler

CMB:
Enclosure