

McDowell Rackner & Gibson PC



WENDY MCINDOO
Direct (503) 595-3922
wendy@mcd-law.com

April 10, 2012

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 1547

Enclosed for filing in the above-referenced docket are the original and one (1) copy of Level 3 Communications, LLC's 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,

Handwritten signature of Wendy McIndoo in cursive script.

Wendy McIndoo
Legal Assistant

cc: Service List

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

3 **UM 1547**

4 In the Matter of

5 PUBLIC UTILITY COMMISSION OF
6 OREGON STAFF,

7 Investigation of Call Termination Issues

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

8

9 Pursuant to ORS 756.525 and OAR 860-012-001, Level 3 Communications, LLC
10 ("Level 3") respectfully petitions the Public Utility Commission of Oregon (the "Commission")
11 for leave to intervene in the above-captioned proceeding with full party status as described
12 in OAR 860-011-0035(7). In support of this petition, Level 3 states as follows:

13

1.

14 The name and address of the Company are:

15 Level 3 Communications, LLC
16 1025 Eldorado Boulevard
Broomfield, CO 80021

17

2.

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

20 **LEVEL 3 COMMUNICATIONS, LLC**
Gregory T. Diamond
21 Regulatory Counsel
1505 5th Avenue
22 Suite 501
Seattle, WA 98101
23 Telephone: 206-652-5608
Email: Greg.Diamond@Level3.com

MCDOWELL RACKNER & GIBSON PC
Lisa F. Rackner
419 SW 11th Avenue, Suite 400
Portland, OR 97205
Telephone: 503-595-3925
Email: dockets@mcd-law.com

24

25

26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

3.

Level 3 is a registered and competitively classified telecommunications company authorized to provide both intraexchange and interexchange telecommunications services throughout Oregon.

4.

Level 3 has a substantial interest in the Commission's investigation into call termination issues in Oregon.

5


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

CONCLUSION

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

DATED: 4-10-12

MCDOWELL RACKNER & GIBSON PC



Lisa F. Rackner
Adam Lowney

LEVEL 3 COMMUNICATIONS, LLC

Greg Diamond
Regulatory Counsel
1505 5th Avenue
Suite 501
Seattle, WA 98101

Of Attorneys for Level 3
Communications, LLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1547 on the following named person(s) on the date indicated below by email and U.S. Mail addressed to said person(s) at his or her last-known address(es) indicated below.

Cynthia Manheim
AT&T
cindy.manheim@att.com

David Collier
AT&T Communications of the
Pacific Northwest Inc.
David.collier@att.com

Ron L. Trullinger
CenturyLink
Ron.trullinger@centurylink.com

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

OPUC Dockets
Citizens' Utility Board of Oregon
dockets@oregoncub.org

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

Charles L. Best
1631 NE Broadway #538
Portland, OR 97232-1425
chuck@charleslbest.com

Michael Dewey
OCTA
mdewey@oregoncable.com

Craig Phillips
Oregon exchange Carrier Association
cphillips@oeca.com

Brant Wolf
Oregon Telecommunications Assn.
bwolf@ota-telecom.org

Malia Brock
Public Utility Commission of Oregon
Malia.brock@state.or.us

Richard Finigan
Law Office of Richard A. Finigan
Rickfinn@localaccess.com

Jason Jones
Department of Justice
Jason.w.jones@state.or.us

Johanna Riemenschneider
Department of Justice
johanna.riemenschneider@state.or.us

Marc M. Carlton
Williams, Kastner & Gibbs PLLC
mcarlton@williamskastner.com

DATED: April 10, 2012



Wendy McIndoo
Office Manager