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March 10, 2009

Oregon Public Utility Commission
Attn: Filing Center
550 Capital St, NE #215
Salem, OR 97308-2148

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MAR 12 2009

Public Utility Commission of Oregon
Administrative Hearing Division

Re: UM 1416; Intervention of City of Lincoln City, Oregon

Dear Commission,

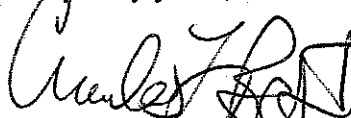
This letter is in response to the City of Lincoln City's ("City") Petition to Intervene. CenturyTel, Inc. ("CenturyTel") believes the City's Petition does not state sufficient grounds for the Commission to grant it. However, in order to expedite the process CenturyTel does not formally oppose the Petition because there may be other appropriate grounds upon which it may be granted.

The City states as the sole basis for its intervention, "[d]ue to the risk that failure of 911 service presents to public safety, petitioner requests status as a party in this proceeding in order to address this public safety concern." See Petition, at p. 1, lines 26-28. This issue is not relevant to this merger proceeding, and there are other means for the City to address its concerns. CenturyTel believes that allowing intervention on the grounds stated by the City would unreasonably expand the issues in the proceeding and lead to unreasonable delay.

Embarq and the City are currently working to address the City's concerns regarding E911 capabilities in the City. Moreover, United Telephone Company of the Northwest will continue to be the entity that serves City customers and there will be no degradation of the quality of that service as a result of the merger. Nonetheless, CenturyTel does not object to intervention by the City so long as it is not based on the issues raised in the City's Petition to Intervene and does not otherwise unreasonably delay or expand the issues in this proceeding.

If you have any questions regarding this filing, please don't hesitate to contact me.

Very truly yours,



Charles L. Best

encls

CERTIFICATE OF SERVICE

I certify that on March 10, 2009, I served the foregoing Response to Petition to Intervene upon all parties of record in Docket No.UM 1416 by email and for parties who have not waived paper service, by U.S. mail, postage prepaid.

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By:

A handwritten signature in black ink, appearing to read "Charles L. Best", is written over a horizontal line.

Charles L. Best
Attorney for CenturyTel, Inc.
OSB No. 781421