

# McDowell & Rackner PC



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July 2, 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 360networks' 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,

A handwritten signature in cursive script that reads "Wendy L. McIndoo".

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 1431 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: July 2, 2009.

  
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3.

360networks is a wholesale supplier of communications services and a registered competitive local exchange carrier in the State of Oregon. 360networks currently has an interconnection agreement with Verizon Northwest, Inc. ("Verizon") in Oregon and is a wholesale customer of Verizon's products, both through its interconnection agreements and through tariffs.

4.

360networks has a substantial interest in the proposed transfer of control of Verizon to Frontier Communications Corporation ("Frontier"). Verizon is the second largest incumbent local exchange carrier in Oregon. 360networks relies on interconnection with, and related services and facilities obtained from, Verizon to offer and provide service to 360networks's customers in Verizon's service territory. 360networks seeks to participate in this proceeding to ensure that the proposed transaction will not adversely impact competition in Oregon or 360networks's rights and ability to obtain the interconnection and related services and facilities it needs to provide its telecommunications services.

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The evidence, if any, and briefing presented by 360networks will be of material value to the Commission in its determination of the issues involved in this proceeding, and 360networks's intervention will not broaden those issues or delay the proceedings.

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**CONCLUSION**

For all of the above reasons, 360networks's Petition to Intervene should be granted.

DATED: 7-2-09

**MCDOWELL & RACKNER PC**



Lisa F. Rackner

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