## OF OREGON UM 1484

In the Matter of

CENTURYLINK, INC.,

Application for Approval of Merger between CenturyTel, Inc. and Qwest Communications International, Inc.

PETITION TO INTERVENE

Waiver of Paper Service

## PETITION TO INTERVENE OF Northwest Public Communications Council

Pursuant to ORS 756.525 and OAR 860-012-001, The Northwest Public Communications Council (NPCC) and those members listed below in paragraph 1, by and through counsel, respectfully petitions to intervene in this proceeding and hereby waives paper service. In support of this petition, the following is provided:

## 1. The Petitioners' Contact information is:

Greg Marshall, President
Northwest Public Communications Council
2373 NW 185<sup>th</sup> Ave. #310
Hillsboro, OR 97124
gmarshall@corbantechnologies.com
503 276 5162

Communication Management Services, LLC Manager, Charles Jones 14250 NW Science Park Dr Ste B Portland, OR 97229 <a href="mailto:charlesjones@cms-nw.com">charlesjones@cms-nw.com</a> 503 939 5874

Pacific Northwest Payphones Randy Linderman, Pres. 1315 NW 185th Ave #215 Beaverton, OR 97006 rlinderman@gofirestream.com 2a. Petitioners will be represented by counsel:

Corporate Lawyers PC FRANK G. PATRICK, OSB 76022 PO Box 231119 Portland, OR 97281 fgplawpc@hotmail.com 503 245-2828

2b. Additional contact to be included waiving paper service on the service list is:

Central Telephone, Inc. Richard Stevens 1505 S. Grant P.O. Box 25 Goldendale, WA 98620 rstevens@gorge.net 541 993 2811

- 3. The Northwest Communications Council has twelve members with an interest in the Oregon Proceedings. The purpose of the Organization is to promote the availability and access to payphones in Oregon and the Northwest and to watchdog to interests of Payphone service providers. It is the only such group active in Oregon on its information and belief.
- 4. The Organization and its members have been continuously involved in the proceedings at the PUC with respect to payphones and the rate cases of the PUC having to do with Qwest since 1996 and before. It has been involved in UT 125 virtually since its inception and currently is prosecuting matters in DR 26 as well as at the United States District Court of Oregon. It is probably the most knowledgeable member of the business community and a Payphone Service Provider regarding the impact of tariffs on the services of PSPs in Oregon.
- 5. The Intervenor intends to raise the outstanding proceedings before the Commission which are still unresolved after eleven years and orders of the Commission which Qwest has not currently satisfied and the outstanding litigation pending between the organization and its

members which are material consideration to its members and the public, with respect to how the

merged companines intend to provide payphones, if at all, and services to existing payphones.

6. The organization is the only group of Payphone Service Providers in Oregon to its

knowledge, and the insight from experience that it has in the issues that have been present and

are ongoing in Oregon as a result of the FCC's actions in implementing the 1996

Telecommunications Act are extensive and relevant. The 1996 Act which intended to promote

the widespread deployment of payphones is impacted by the shifting of duties and obligations

that a successor to one of the Regional Bell Operating Companies will have on this segment of

the ratepayers in Oregon.

7. Based on the information provided above and in accordance with the Commission's

Rules of Procedure, the Intevenors in this Petition will be of material value to the Commission

in its determination of the issues raised in this proceeding. Their intervention in this proceeding

will not unreasonably broaden the issues to be considered by the Commission nor will it burden

the record or delay this proceeding, per OAR 860-012-0001.

Dated this 26th day of June 2010

/s/

FRANK G. PATRICK, OSB 76022

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Portland, OR 97281

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<u>igpiawpe@notinan.e</u>

503 245-2828

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## CERTIFICATE OF SERVICE

I, the undersigned below, hereby certify that I served the foregoing PETITION TO INTERVENE For The Northwest Public Communications Council AND its NAMED MEMBERS on the following by mail and electronic service of those waiving as follows:

by the following indicated method or methods:

X\_\_\_\_by mailing & emailing ( as indicated above) a full, true, and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed to the attorney as shown above, the last-known office address of the attorney, and deposited with the United States Postal Service at Portland, Oregon, and by electronic mail on the date set forth below;

And Certify that I did electronically file same with the PUC Filing Center, with a hard copy to PUC, Filing Center, 550 Capitol Street NE, Ste 215, PO Box 2148, Salem, OR 97308-2148.

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Dated June 26, 2010	
_/s/	
FRANK G. PATRICK, OSB 760228	