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ARIZONA CORPORATION COMMISSION  
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Arizona Corporation Commission

DOCKETED

JUN 10 2010

Attorneys for Intervenor-Applicant CWA

BEFORE THE ARIZONA

CORPORATION COMMISSION

DOCKETED BY

14 IN THE MATTER OF THE JOINT  
15 NOTICE AND APPLICATION OF  
16 QWEST CORPORATION, QWEST  
17 COMMUNICATIONS COMPANY,  
18 LLC, QWEST LD CORP., EMBARQ  
19 COMMUNICATIONS, INC. D/B/A  
20 CENTURYLINK COMMUNICATIONS,  
21 EMBARQ PAYPHONE SERVICES,  
22 INC. D/B/A CENTURY LINK,  
AND CENTURYTEL SOLUTIONS,  
LLC, FOR APPROVAL OF THE  
PROPOSED MERGER OF THEIR  
CORPORATIONS QWEST  
COMMUNICATIONS  
INTERNATIONAL INC. AND  
CENTURYTEL, INC.

Docket Nos. T-01051B-10-0194  
T-02811B-10-0194  
T-04190A-10-0194  
T-20443A-10-0194  
T-03555A-10-0194  
T-03902A-10-0194

**CWA'S APPLICATION TO  
INTERVENE**

23 Pursuant to A.A.C. R14-3-105(A) and (B), the  
24 Communications Workers of America, AFL-CIO, CLC ("CWA"), by  
25 and through undersigned counsel, hereby moves the Arizona  
26 Corporation Commission ("ACC") for leave to intervene as a  
27 party in the above-captioned matter. In support of this  
28

1 Application, the CWA states as follows:

2 1. CWA is an international labor union with its  
3 principal place of business at 501 Third Street, N.W.,  
4 Washington, D.C. 20001. The CWA also maintains an office  
5 in Arizona, at 1951 West Camelback Road, Suite 335, Phoenix,  
6 85015 to represent the interests of its members in the  
7 state, including its members who are employed by Qwest  
8 Corporation ("Qwest"), many of whom are also customers of  
9 Qwest.

10 2. The CWA is "directly and substantially affected by  
11 the proceedings," *id.*, inasmuch as it is the exclusive  
12 representative of approximately 2,150 Qwest employees in the  
13 State of Arizona. These Qwest employees are covered by a  
14 collective bargaining agreement covering terms and  
15 conditions of employment at Qwest.

16 3. The CWA will be represented by, and all documents  
17 should be served upon, its counsel:

18 LUBIN & ENOCH, P.C.  
19 Nicholas J. Enoch, Esq.  
20 Jarrett J. Haskovec, Esq.  
21 349 North Fourth Avenue  
22 Phoenix, Arizona 85003  
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26 CWA also asks that a copy of all documents be served on the  
27 following attorney for whom a motion for admission *pro hac*  
28 *vice* will be filed in the near future:

///

///

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2 333 Oak Lane  
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7 4. CWA-represented employees at Qwest in Arizona  
8 include workers responsible for building and maintaining  
9 telecommunications networks in the state as well as customer  
10 service workers who serve as the public interface for the  
11 company. CWA members provide service to both residential  
12 and business customers.

13 5. The outcome of this proceeding will have direct  
14 bearing on the interests of CWA's members in Arizona, both  
15 as employees of an acquired company and as consumers of  
16 telecommunications services. Among other matters, the CWA  
17 is concerned that a merger of these two companies will or  
18 may result in a:

- 19 a. diminution in the safety and quality of service  
20 provided by Qwest to the public;
- 21 b. reduction in the level of monetary and other  
22 resources retained by, or available to, Qwest in  
23 Arizona; and
- 24 c. reduction in the level of investment Qwest will  
25 make in Arizona for broadband facilities and  
26 services, as well as local telephone  
27 infrastructure and operations.

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1 Original and thirteen (13) copies  
2 of CWA's Application filed this  
3 10<sup>th</sup> day of June, 2010, with:

3 Arizona Corporation Commission  
4 Docket Control Center  
5 1200 West Washington Street  
6 Phoenix, Arizona 85007-2996

7 Copies of the foregoing  
8 transmitted via regular\*/e-mail  
9 this same date to:

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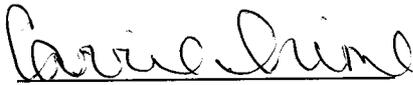
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