Law Office of Richard A. Finnigan

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May 1, 2007

VIA E-MAIL AND U.S. MAIL

Frances Nichols-Anglin Oregon Public Utility Commission 550 Capitol St, NE Suite 215 Salem, OR 97301

Re: UM 1299 - Beaver Creek Cooperative Telephone Company's Reply

to Qwest's Motion for a Brief Extension of Time

Dear Ms. Nichols-Anglin:

Enclosed are the original and five copies of Beaver Creek Cooperative Telephone Company's Reply to Qwest's Motion for a Brief Extension of Time and Certificate of Service.

RICHARD A FINNIGAN

RAF/km Enclosures

cc: Carla M. Butler (via U.S. mail and e-mail)
Alex Duarte (via U.S. mail and e-mail)
Tom Linstrom (via e-mail)

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BEAVER CREEK COOPERATIVE TELEPHONE COMPANY'S REPLY TO QWEST'S MOTION FOR A BRIEF EXTENSION OF TIME - 1

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1299

In the Matter of

QWEST CORPORATION

Petition to Abandon Local Exchange Services in the Beavercreek Exchange (UA 55 Area)

BEAVER CREEK COOPERATIVE TELEPHONE COMPANY'S REPLY TO QWEST'S MOTION FOR A BRIEF EXTENSION OF TIME

Beaver Creek Cooperative Telephone Company ("BCT") hereby files this reply to Qwest's Motion for a Brief Extension of Time ("Motion").

In its Motion, Qwest notes that it has ten customers in the Beavercreek exchange that it continues to serve on a retail or wholesale basis. Eight of those customers are served on a wholesale basis.

The premise of Qwest's Motion is that it inadvertently discovered that it did not send out notice to customers in a timely fashion to advise them of Qwest's 214 Application, thus delaying the time for the 214 Application to be deemed granted.

As it turns out, despite having three years to make its decision, Qwest waited to the very last moment to file its Section 214 Application at the FCC. Thus, Qwest allowed itself no room for error. Now that Qwest has found it has made an error, it is seeking an extension of time.

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It should also be noted that this situation has been compounded by the fact that Owest allowed customers in the Beavercreek exchange to have their numbers ported to competitive local exchange carriers (CLECs) using Oregon City numbers. Obviously, this is contrary to number assignment guidelines. In addition, when those CLECs were contacted by BCT, the CLECs expressed no desire to serve in BCT's incumbent territory. Thus, the customers are having to go through yet another transition.

Because this situation was created by Qwest waiting until the last moment and has been further complicated by Owest's improper porting of numbers, BCT requests that Owest's Motion be conditioned. Obviously, there is not much that can be done about the fact that the 214 process will take until late May to complete. Thus, an extension of time cannot be avoided. However, because this extension of time is due to Qwest's error, inadvertent or not, and has been compounded by Owest's improper porting of numbers, BCT respectfully requests that the Commission condition Owest's Motion on Owest holding BCT harmless from all additional costs and lost revenues that have resulted from Qwest's extension of time.

BCT thanks the Commission for its consideration of this request for a condition to be placed on Owest's Motion.

Dated this 1st day of May, 2007.

RICHARD A. FINMGAN, OSB# 96535 Attorney for Beaver Creek Cooperative

Telephone Company

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BEAVER CREEK COOPERATIVE TELEPHONE COMPANY'S REPLY TO QWEST'S MOTION FOR A BRIEF **EXTENSION OF TIME - 2**

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CERTIFICATE OF SERVICE UM 1299

I hereby certify that I have served the attached Beaver Creek Cooperative Telephone Company's Reply to Qwest's Motion for a Brief Extension of Time upon all parties of record in this proceeding by U.S. mail and electronic mail, pursuant to OAR 860-013-0070, to the following parties or attorneys of parties:

CARLA M. BUTLER
QWEST CORPORATION
421 SW OAK STREET, ROOM 810
PORTLAND, OR 97204
carla.butler@gwest.com

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ALEX M. DUARTE QWEST CORPORATION 421 SW OAK STREET, ROOM 810 PORTLAND, OR 97204 alex.duarte@qwest.com

I further certify that I have sent the attached Beaver Creek Cooperative Telephone Company's Reply to Qwest's Motion for a Brief Extension of Time by U.S. mail and electronic mail to the following:

FRANCES NICHOLS-ANGLIN
OREGON PUBLIC UTILITY
COMMISSION
550 CAPITOL STREET NE, STE 215
SALEM, OR 97301
frances.nichols@state.or.us

Dated this 1st day of May, 2007.

Richard A. Finnigan, OSB No. 96535

Attorney for Beaver Creek

Cooperative Telephone Company

26

CERTIFICATE OF SERVICE - 1

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