



January 9, 2008

OPUC Filing Center  
550 Capitol Street NE Suite 215  
Salem, Oregon 97301

Re: AR 523 - In the Matter of a Rulemaking to Amend Timeframes for Audits of Fees Due

The Oregon Telecommunications Association (OTA) files these comments addressing the rulemaking proceeding referenced above.

The OTA supports the Oregon Public Utility Commission (OPUC) in its efforts to ensure that all parties subject to OPUC jurisdiction operate in a manner that allows for the lawful collection of fees. However, the OTA does have concerns with the proposed rule change contemplated in AR 523.

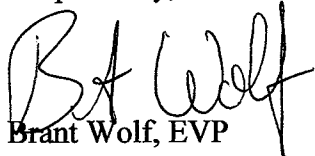
The Fiscal and Economic Impact Statement and Cost of Compliance language included with the Notice of Proposed Rulemaking states in part that "... if the providers are operating in compliance with the applicable laws and rules, there will be no change to the providers procedures or current cost of compliance." The OTA disagrees with this assessment.

If a company is expected to forever maintain certain documents and other relevant materials subject to audit then there certainly will be an impact on OTA member companies. What that impact might be will probably vary from one company to the next. However, claiming there will be no economic or procedural impact on a company is simply false. Without going into too much detail in these comments, the OTA would ask that issues such as physical space requirements and management of retaining these records forever be given proper consideration.

Nowhere in the Notice of Proposed Rulemaking Hearing is it stated why this change is needed. If the OPUC is aware of fraudulent behavior that would necessitate or validate the proposed change it should be indicated in the Notice. Otherwise, the current three year audit time frame is reasonable and should be considered sufficient.

In conclusion, the OTA requests that the OPUC not adopt the proposed changes contemplated in AR 523. The OTA appreciates the consideration of these comments.

Respectfully,

A handwritten signature in black ink that reads "Brant Wolf". The signature is written in a cursive style with a large initial "B" and "W".

Brant Wolf, EVP

Oregon Telecommunications Association