

# McDowell & Rackner PC



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February 12, 2008

## VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

**Re: UM \_\_\_\_ - Application of Comspan Communications Inc. for Approval of Eligibility to Participate in the Oregon Universal Service Fund**

Enclosed for filing, please find an original and one copy of Comspan Communications, Inc.'s signed Affidavit of Jan Summarell.

Very truly yours,

A handwritten signature in black ink that reads "Wendy L. McIndoo". The signature is written in a cursive style.

Wendy L. McIndoo  
Legal Assistant

Enclosure

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM \_\_\_\_\_

Application of Comspan Communications  
Inc. for Approval of Eligibility to Participate  
in the Oregon Universal Service Fund.

**AFFIDAVIT OF  
JAN SUMMARELL**

I Jan Summarell do hereby affirm as follows:

1. I am Senior Vice President and Chief Operating Officer ("COO") of Comspan Communications Inc. ("Comspan") and I make this affidavit in support of Comspan Communications Inc.'s Application for Approval of Eligibility to Participate in the Oregon Universal Service Fund ("OUSF") in the Veneta, Reedsport, and Myrtle Point wire centers ("Application").
2. I am familiar with the eligibility criteria for authorization to receive funds from the OUSF and the requirements imposed by the Public Utility Commission of Oregon (the "Commission") upon eligible telecommunications carriers ("ETC").
3. As detailed below, in my role as COO of the Company, I affirm Comspan's commitment to carrying out the commitments made in its Application, and fulfilling all other requirements for ETC status as may be imposed by the Commission.
4. Comspan agrees to fulfill all requirements for providing Oregon Telephone Assistance Program ("OTAP") service, including the requirement not to deny or disconnect local exchange service for failure to pay toll charges.
5. Comspan agrees to fulfill all requirements for providing OTAP service including the requirement not to demand a deposit from customers who voluntarily elect to receive toll-blocking service.

- 1        6.        Comspan accepts the duty to interconnect directly or indirectly and commits  
2                    to interconnecting with the facilities and equipment of other  
3                    telecommunications carriers.
- 4        7.        Comspan accepts the duty not to install network features, functions, or  
5                    capabilities that do not comply with the Telecommunications Act's  
6                    requirements for access by persons with disabilities and coordination for  
7                    interconnectivity and commits to fulfilling this requirement.
- 8        8.        Comspan will not prohibit or impose unreasonable or discriminatory  
9                    conditions or limitations on the resale of telecommunications services.
- 10       9.       Comspan will provide, to the extent technically feasible, number portability in  
11                   compliance with FCC rules.
- 12       10.       Comspan will provide dialing parity to other telecommunications providers.
- 13       11.       Comspan will provide access to rights-of-way to other telecommunications  
14                   carriers.
- 15       12.       Comspan will establish reciprocal compensation arrangements for the  
16                   transport and termination of telecommunications.
- 17       13.       Comspan will provide supported services on a standalone basis under the  
18                   general terms outlined in the Application.
- 19       14.       Comspan will build its own loop facilities to serve a customer where no  
20                   facilities currently exist.
- 21       15.       Comspan agrees that it will share per-line support amounts with Qwest and  
22                   Verizon calculated based on current percentages, with no true-ups or  
23                   disbursements if percentages are revised.

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