Law Office of Richard A. Finnigan

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November 13, 2008

VIA ELECTRONIC MAIL AND U.S. MAIL

Administrative Law Judge Sarah Wallace Oregon Public Utility Commission PO Box 2148 Salem, OR 97308-2148

Re: ARB 830 - Request for Guidance on Filing

Dear Administrative Law Judge Wallace:

On November 7, 2008, Sprint filed an Interconnection Agreement and a Motion. In the scope of the Motion, Sprint implied that their filing falls under OAR 860-016-0030 by referencing CenturyTel filing objections pursuant to that rule. Presumably, Sprint was referencing OAR 860-016-0030(12). However, it appears to CenturyTel that OAR 860-016-0030(12) is not applicable in this situation because of Sprint's filing in the form of a motion.

The difference is that objections to an interconnection agreement filed under OAR 860-016-0030(12) is due within ten days of filing. However, under OAR 860-013-0050(3)(d), a response to a motion is to be filed within fifteen days of the service of the motion.

CenturyTel respectfully submits that in this situation, given Sprint's characterization of their filing as a motion, the provisions of OAR 860-013-0050(3) controls.

In any event, I have been in contact with Judy Endejan as counsel for Sprint. Sprint does not have an objection to CenturyTel filing its response/objection within fifteen days of service. This letter is to request confirmation that the Commission will accept the agreement of parties that CenturyTel's response/objection may be filed fifteen days after service.

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Thank you for your attention to this matter.

Sincerely

RICHARD A. FINNIGAN

RAF/km

cc: Service List (via e-mail or e-mail and U.S. mail)

Max Cox (via e-mail)
Paul Schudel (via e-mail)
Tom Moorman (via e-mail)

1 CERTIFICATE OF SERVICE 2 ARB 830 3 I certify that I have this day sent the attached letter to Administrative Law Judge Sarah Wallace by electronic mail and U.S. mail to the following: 4 FILING CENTER 5 PUBLIC UTILITY COMMISSION OF OREGON PO BOX 2148 SALEM, OR 97308-2148 7 puc.filingcenter@state.or.us 8 I further certify that I have this day sent the attached letter to Administrative Law Judge Sarah Wallace by the method specified below and electronic mail pursuant to OAR 860-013-0070, to the following parties or attorneys of parties: 10 JUDITH ENDEJAN JANETTE LUEHRING 11 6450 SPRINT PKWY 2801 ALASKAN WAY SUITE 300 MAILSTOP: KSOPHN0304 - 3b653 12 SEATTLE, WA 98121 OVERLAND PARK, KS 66251 jendejan@grahamdunn.com janette.w.luehring@sprint.com 13 VIA E-MAIL AND U.S. MAIL VIA E-MAIL ONLY 14 KRISTIN L. JACOBSON 15 201 MISSION ST STE 1400 SAN FRANCISCO, CA 94105 16 kristin.l.jacobson@sprint.com VIA E-MAIL ONLY 17 Dated at Olympia, Washington, this 13th day of November, 2008. 18 19 20 Richard A. Finnigan, ØSB #965357 21 Attorney for CenturyTel of Oregon, Inc. 22 23 24 25 26

CERTIFICATE OF SERVICE - 1

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