

MARIANNE DUGAN

Attorney at Law

email mdugan@mdugan.com
website www.mdugan.com

259 E. 5th Ave., Ste 200-D
Eugene OR 97401-2677

Telephone 541-338-7072
Facsimile 866-650-5213

January 25, 2009

VIA ELECTRONIC MAIL AND U.S. MAIL
Filing Center
Oregon Public Utility Commission
550 Capitol Street NE, Suite 215
Salem, OR 97301-2551

Re: ARB 864 - Western Radio's Motion for Clarification and Procedural Schedule

Dear Sir/Madam:

Enclosed for filing is Western Radio's Motion for Clarification and Procedural Schedule in the above-referenced matter. Also enclosed is a Certificate of Service.

Very truly yours,

Marianne Dugan

encl

cc: parties and counsel of record

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 ARB 864

4 In the Matter of)
5 WESTERN RADIO SERVICES) WESTERN RADIO'S MOTION
6 COMPANY) FOR CLARIFICATION AND
7 Request for Interconnection Agreement) PROCEDURAL SCHEDULE
8 with CENTURYTEL OF EASTERN)
9 OREGON, INC.)

10 Western Radio seeks clarification from the ALJ, and asks the ALJ to order an appropriate
11 process to explain further the open issues presented by Western Radio (for example, how
12 CenturyTel's and Western Radio's proposed IA's differ). In reviewing the relevant state and
13 federal statutes and regulations, Western's attorney finds nothing which provides clear guidance
14 on this matter.

15 It appears to Western's attorney that the next appropriate step is for the PUC to ask for
16 specific information pursuant to 47 U.S.C. 252(b)(4)(B).

17 It also appears to Western's attorney that the nine-month period set by section
18 252(b)(4)(C) ends March 16. Given that timing, Western suggests that testimony be submitted
19 by February 9 and briefing by February 23.

20 Dated January 25, 2009.

21 s/ Marianne Dugan
22 Marianne Dugan, OSB 93256
23 Attorney at Law
24 259 E. 5th Ave., Ste 200D
Eugene, OR 97401
(541) 338-7072
Fax (866) 650-5213
mdugan@mdugan.com

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

ARB 864

In the Matter of)	
)	CERTIFICATE OF SERVICE
WESTERN RADIO SERVICES)	
COMPANY)	
)	
Request for Interconnection Agreement)	
with CENTURYTEL OF EASTERN)	
OREGON, INC.)	

I certify that on January 25, 2009, I sent Western Radio's Motion for Clarification and Procedural Schedule by electronic mail and U.S. mail to the following:

Filing Center
Public Utility Commission of Oregon
550 Capitol Street NE, Suite 215
Salem, OR 97301-2551
puc.filingcenter@state.or.us

I further certify that on January 25, 2009, I also served copies of the above-referenced document upon all parties of record in this proceeding by mailing a copy properly addressed with first class postage prepaid, and by electronic mail pursuant to OAR 860-013-0070, to the following parties or attorneys of parties:

Calvin K. Simshaw
Century Telephone of Eastern Oregon
805 Broadway, VH1065
Vancouver, WA 98660-3277
calvin.simshaw@CenturyTel.com

Michael T. Weirich
Assistant Attorney General
Regulated Utility & Business Section

1162 Court St NE
Salem, OR 97301-4096
michael.weirich@doj.state.or.us

Richard L. Oberdorfer
Western Radio Services Co Inc
Bend, OR 97701
oberdorfer@earthlink.net

Richard A. Finnigan
2112 Black Lake Blvd SW
Olympia, WA 98512
rickfinn@localaccess.com

Dated January 25, 2009.

/s/ Marianne Dugan
Marianne Dugan, OSB # 93256
Attorney for Western Radio
259 E. 5th Ave., Suite 200-D
Eugene, Oregon 97401
(541) 338-7072