

June 15, 2011

Filing Center
Public Utility Commission of Oregon
550 Capitol Street, NE
Salem, Oregon 97308

Re: In the Matter of TracFone Wireless, Inc. Application for Designation as an Eligible

Telecommunications Carrier;

Docket No. UM 1437

Dear Filing Center:

Enclosed for filing please find the Staff Motion to Extend Due Date for Joint Testimony in Support of Stipulation.

The appropriate number of hard copies will be filed with the Filing Center tomorrow. Because this motion requests an immediate extension, Staff requests expedited consideration pursuant to OAR 860-001-0420(7).

Thank you for your attention.

Very truly yours,

Stephanie S. Andrus

Senior Assistant Attorney General

Of Counsel for Staff of the Public Utility

Commission of Oregon

Enc.

c. service list

1	BEFORE THE PUBLIC	UTILITY COMMISSION	
2	OF OREGON		
3			
4	UM 1437		
5	In the Matter of	MOTION TO EXTEND DUE DATE FOR JOINT	
6	TRACFONE WIRELESS, INC.	TESTIMONY IN SUPPORT OF STIPULATION	
7	Application for Designation as an Eligible Telecommunications Carrier.	Expedited Consideration Requested	
8			
9	Staff of the Public Utility Commission of Oregon asks the Administrative Law Judge to		
10	extend by two days, until June 17, 2011, the due date for filing joint testimony in support of the		
11	Stipulation previously filed by the parties to this docket. This motion is supported by the other		
12	parties to the docket and to the Stipulation, TracFone Wireless, Inc., the Citizens' Utility Board		
13	of Oregon, and the Office of Emergency Management.		
14	The Joint Testimony is substantially finished. Additional time is needed to ensure that		
15	each party's edits are incorporated into the final draft. Accordingly, the stipulating parties would		
16	like an additional two days in which to finalize and file the Joint Testimony.		
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25	///		
26	1 Staff files this motion pursuant to OAR 860-00	01-0090(1)(h).	
Page	1 - MOTION TO EXTEND DUE DATE FOR STIPULATION		

Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (503) 947-4342 / Fax: (503) 378-3784

1	Because the Joint Testimony is due today	y, Staff requests expedited consideration. <sup>2</sup> All			
2	parties to the docket have been notified of this m	otion and all support it.			
3	, M				
4	DATED this _\(\sum_{\text{day}}\) day of June 2011.				
5		Respectfully submitted,			
6		JOHN R. KROGER			
7		Attorney General			
8		$\mathcal{H}$ $\mathcal{H}$			
9		Stephanie S. Andrus, #92512			
10		Senior Assistant Attorney General Of Attorneys for Staff of the Public Utility			
11		Commission of Oregon			
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26	<sup>2</sup> OAR 860-001-0420(7).				
Page	Page 2 - MOTION TO EXTEND DUE DATE FOR JOINT TESTIMONY IN SUPPORT OF				

Page 2 - MOTION TO EXTEND DUE DATE FOR JOINT TESTIMONY IN SUPPORT OF STIPULATION
SSA/ssa/# 2857791 Department of Justice

1	CERTIFICATE OF SERVICE		
2	I certify that on June 15, 2011, I served the foregoing Motion to Extend Due Date for		
3	Joint Testimony in Support of Stipulation upon the parties in this proceeding by electronic mail		
4	Hard copy to be filed on Thursday, June 16, 2011.		
5	W	W OREGON DEPARTMENT OF JUSTICE	
6	CITIZENS' UTILITY BOARD OF OREGON GORDON FEIGHNER (C) ENERGY ANALYST	STEVEN A WOLF (C) ASSISTANT ATTORNEY GENERAL	
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11	bob@oregoncub.org	PORTLAND OR 97209-4128 lreichman@perkinscole.com	
12	G. CATRIONA MCCRACKEN <b>(C)</b> LEGAL COUNSEL/STAFF ATTY 610 SW BROADWAY, STE 400 PORTLAND OR 97205	W PUBLIC UTILITY COMMISSION OF OREGON JON CRAY (C)	
13	catriona@oregoncub.org	RSPF PROGRAM MANAGER 550 CAPITOL ST NE, SUITE 215	
14 15 16	W GREENBERG TRAURIG, LLP MITCHELL F BRECHER (C) 2101 L STREET NW, SUITE 1000 WASHINGTON DC 20037 brecherm@gtlaw.com	SALEM OR 97301 jon.cray@state.or.us  KAY MARINOS (C) PO BOX 2148 SALEM OR 97308-2148	
17 18	DEBRA MCGUIRE MERCER (C) 2101 L STREET NW, SUITE 1000 WASHINGTON DC 20037 mercerdm@gtlaw.com	kay.marlnos@state.or.us	
19		Homa Jane	
20		Neoma Lane	
21		Legal Secretary	
22		Department of Justice Business Activities Section	
23			
24			
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