

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, Washington 98512
Fax (360) 587-3852

Richard A. Finnigan
(360) 956-7001
rickfinn@localaccess.com

Kathy McCrary, Paralegal
(360) 753-7012
kathym@localaccess.com

July 19, 2010

VIA ELECTRONIC MAIL AND U.S. MAIL

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

Re: UM 1481 – Oregon Telecommunications Association Data
Regarding Local Rates

Dear Sir/Madam:

Comments at earlier workshops in this docket expressed a desire to see some quantification of possible effects of changes in access reform and universal service reform may have on Oregon ILECs. This goes to the basic concept of why there is a need to examine universal service issues related to the state fund at this time.

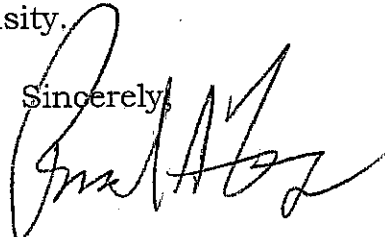
Attached you will find a number of data slides and comparisons that show what could happen to Oregon ILECs and the rates that their customers would need to pay as a result of access reform and universal service reform. This data goes to the heart of demonstrating why this docket is very critical at this juncture.

For the information of parties participating in the docket, there is a more detailed discussion of these charts and graphs in the Comments of the Oregon Telecommunications Association and the Washington Independent Telecommunications Association submitted to the FCC on July 12, 2010 in WC Docket No. 10-90, et al.

Filing Center
July 19, 2010
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In addition, OTA is including two slides that depict the TDS serving areas in Oregon of Asotin (Flora Troy) and Home operating companies. The purpose of these depictions is to underscore the role of density in providing universal service and meeting carrier of last resort obligations. As the reader can see from reviewing these depictions, there are extremely remote areas that are served in order to meet carrier of last resort obligations. While there may be pockets of populations that are relatively more dense (and that term is used loosely since the densities do not begin to approach major metropolitan areas), there are also vast regions of very low density.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Finnigan', written over the word 'Sincerely,'.

RICHARD A. FINNIGAN

RAF/km
Enclosure

cc: Service List (via U.S. mail)
Member Companies (via e-mail)
Brant Wolf (via e-mail)

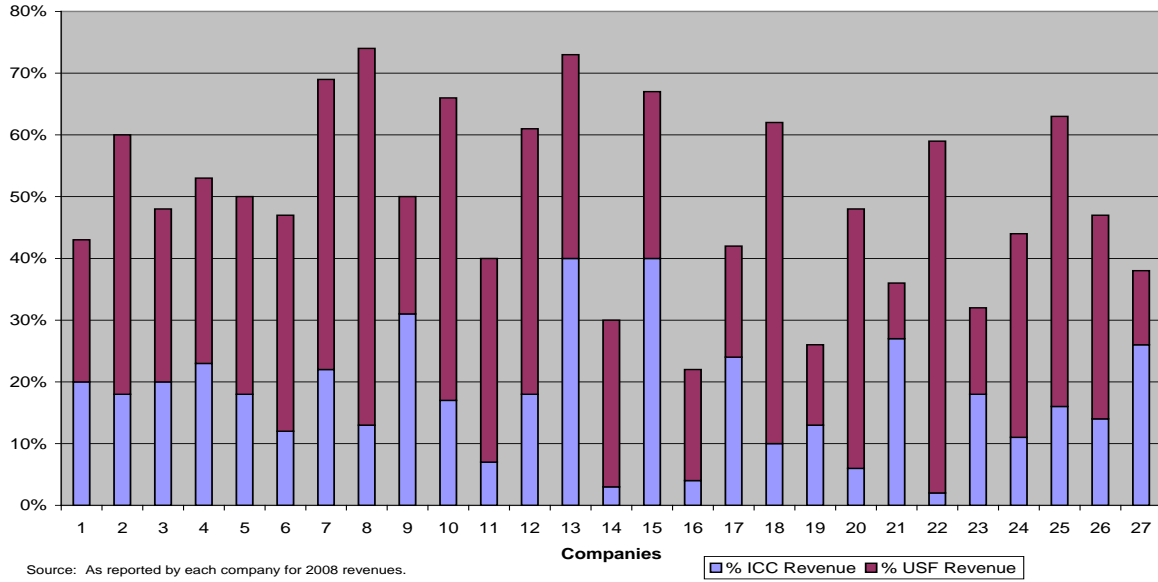
OTA MEMBERS
DENSITY ANALYSIS

Company	Square Miles Served*	2010 Working Loops**	Density (loops/sq. mi.)
Asotin	116	137	1.18
Beaver Creek	64	4,214	65.84
Canby	84	10,090	120.12
Cascade	1,762	8,346	4.74
CenturyLink	29,965	106,313	3.55
Clear Creek	52	3,313	63.71
ColtonTel	62	1,084	17.48
Eagle	250	465	1.86
Gervais	32	908	28.38
Helix	180	284	1.58
Home	730	750	1.03
Molalla	290	5,745	19.81
Monitor	43	638	14.84
Monroe	50	919	18.38
Mt. Angel	17	1,813	106.65
Nehalem	374	2,966	7.93
North-State	323	486	1.50
OR-Idaho	4,486	676	0.15
Oregon Tel	1,278	1,685	1.32
People's	60	1,232	20.53
Pine	620	987	1.59
Pioneer	1,330	13,864	10.42
Roome	65	644	9.91
St. Paul	34	605	17.79
Scio	100	1,674	16.74
Stayton	106	6,454	60.89
Trans-Cascades	893	200	0.22

*As reported by the company

**From USAC Report HC05, 2nd Quarter 2010

OTA Member Companies
 Percent Total Regulated Telecommunication Revenue From ICC/USF
 (Company Average - 50%)



OTA ILEC MEMBERS

EFFECT OF TRANSITION OF INTRASTATE SWITCHED ACCESS RATES
TO COMPOSITE INTERSTATE SWITCHED RATE LEVEL

Company	Current Rate*	Post Transition Rate**
Asotin	\$12.25	\$32.52
Beaver Creek	\$24.00	\$32.93
Canby	\$24.08	\$33.43
Cascade	\$27.39/\$23.74	\$37.81/\$34.16
CenturyLink	\$18.84	\$24.43
Clear Creek	\$26.37	\$35.47
ColtonTel	\$37.85	\$46.52
Eagle	\$11.60	\$26.58
Gervais	\$27.95	\$40.78
Helix	\$15.67-\$19.67	\$28.29-\$32.29
Home	\$16.55	\$35.92
Molalla	\$27.95	\$36.00
Monitor	\$16.65	\$28.68
Monroe	\$23.58	\$33.85
Mt. Angel	\$18.00	\$28.43
Nehalem	\$13.00	\$29.40
North-State	\$26.80	\$42.41
OR-Idaho	\$11.65-\$20.05	\$24.74-\$33.14
Oregon Tel	\$22.50	\$43.27
People's	\$22.90	\$33.48
Pine	\$10.00	\$26.87
Pioneer	\$16.45	\$30.03
Roome	\$27.00/\$30.00	\$42.26/\$45.26
St. Paul	\$20.85	\$33.04
Scio	\$23.15-\$24.50	\$28.86-\$30.21
Stayton	\$18.49	\$31.86
Trans-Cascades	\$22.12	\$38.72

*Taken from company tariffs and pricing schedules for residential rates including EAS.

**Includes existing \$6.50 Subscriber Line Charge.

OTA ILEC MEMBERS
EFFECT OF TRANSITION OF SWITCHED
ACCESS RATES TO "0" RATE

Company	Existing Local Rate* (w/EAS)	Rate After Transition**
Asotin	\$12.25	\$45.10
Beaver Creek	\$24.00	\$38.95
Canby	\$24.08	\$42.66
Cascade	\$27.39/\$23.74	\$53.51/\$49.86
Clear Creek	\$26.37	\$43.26
ColtonTel	\$37.85	\$74.79
Eagle	\$11.60	\$41.54
Gervais	\$27.95	\$60.20
Helix	\$15.67-\$19.67	\$135.57-\$139.57
Home	\$16.55	\$41.66
Molalla	\$27.95	\$42.93
Monitor	\$16.65	\$71.13
Monroe	\$23.58	\$35.81
Mt. Angel	\$18.00	\$41.20
Nehalem	\$13.00	\$30.19
North-State	\$26.80	\$75.69
OR-Idaho	\$11.65-\$20.05	\$39.81-\$48.21
Oregon Tel	\$22.50	\$58.66
People's	\$22.90	\$80.59
Pine	\$10.00	\$22.30
Pioneer	\$16.45	\$42.11
Roome	\$27.00/\$30.00	\$59.38/\$62.38
St. Paul	\$20.85	\$59.22
Scio	\$23.15-\$24.50	\$29.37-\$30.72
Stayton	\$18.49	\$53.15
Trans-Cascades	\$22.12	\$51.33

*Residential Rate

**Includes existing SLC at \$6.50 per month

OREGON STATE
COUNTY DENSITY COMPARISON

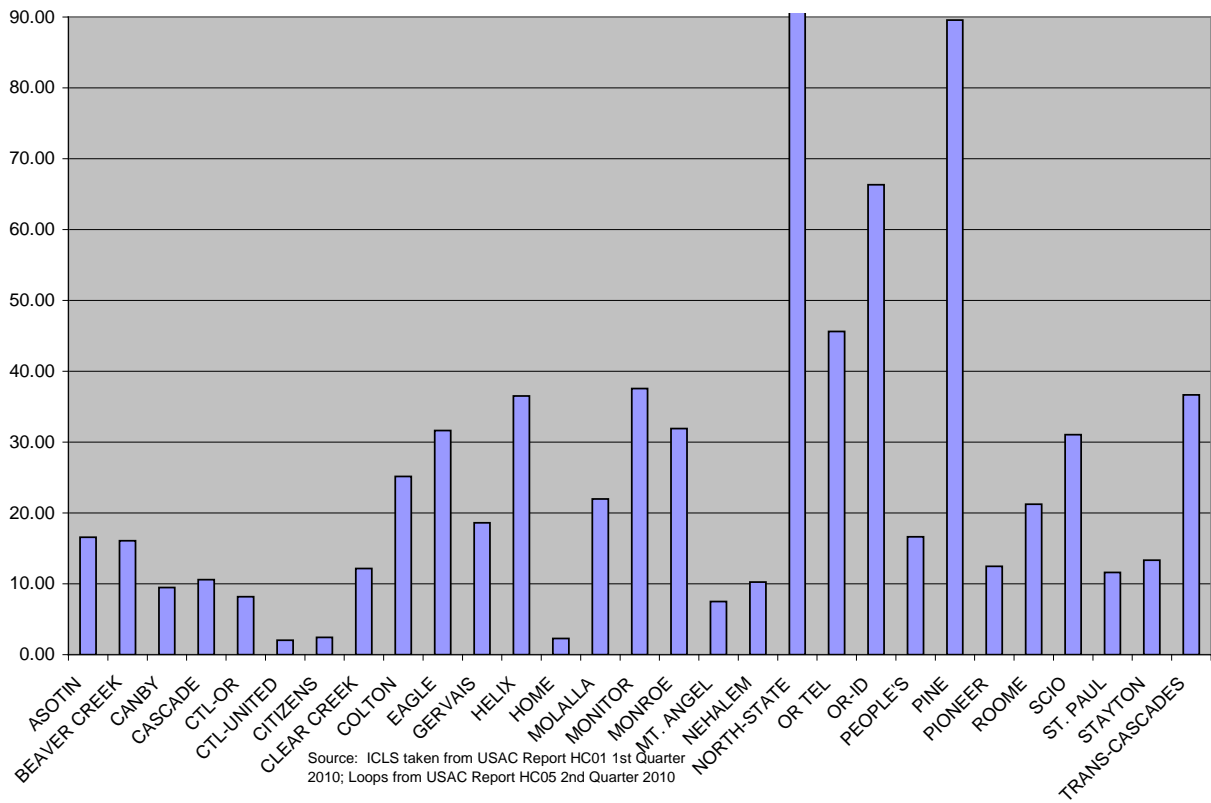
Company	Density (loops/sq. mi.)*	County	Population/ Sq. Mi.**
Asotin	1.18	Wallowa	2.3
Beaver Creek	65.84	Clackamas	181.2
Canby	120.12	Clackamas	181.2
Cascade***	4.74	Clackamas	181.2
Clear Creek	63.71	Clackamas	181.2
ColtonTel	17.48	Clackamas	181.2
Eagle	1.86	Baker	5.5
Gervais	28.38	Marion	240.6
Helix	1.58	Umatilla	21.9
Home	1.03	Gilliam	1.6
Molalla	19.81	Clackamas	181.2
Monitor	14.84	Marion	240.6
Monroe	18.38	Benton	35.6
Mt. Angel	106.65	Marion	240.6
Nehalem	7.42	Tillamook	22.0
North-State	1.50	Wasco	10.0
OR-Idaho	0.15	Malheur	3.2
Oregon Tel***	1.32	Baker	5.5
People's***	20.53	Linn	45.0
Pine	1.59	Baker	5.5
Pioneer	10.42	Benton/Lane	35.6/70.9
Roome	9.91	Linn	45.0
St. Paul	17.79	Marion	240.6
Scio	16.74	Linn	45.0
Stayton***	60.89	Marion	240.6
Trans-Cascades	0.22	Wasco/Jefferson	10.0/10.7

*Taken from Table 2, above.

**Census Bureau Quick Facts at <http://quickfacts.census.gov/qfd/status/41000.html>

***Cascade also serves exchanges in Baker and Douglas Counties. The exchange in Clackamas County is its largest exchange. Oregon Tel also serves exchanges in Grant and Malheur Counties. Stayton also serves territory in Linn County. Stayton's primary service area (the City of Stayton) is in Marion County. People's service area includes a portion of Marion County.

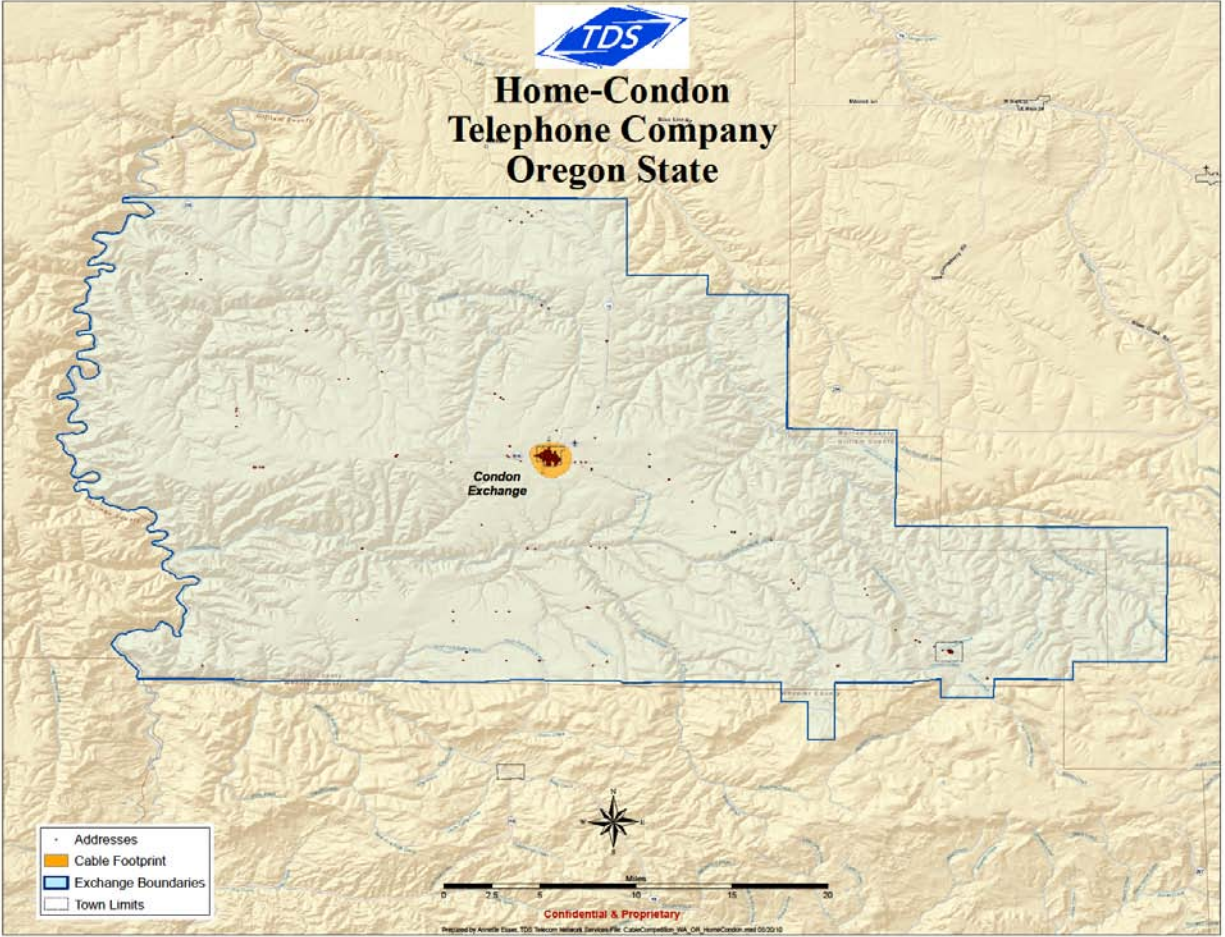
OTA Member Companies
Frozen Per Line Per Month ICLS (IAS)

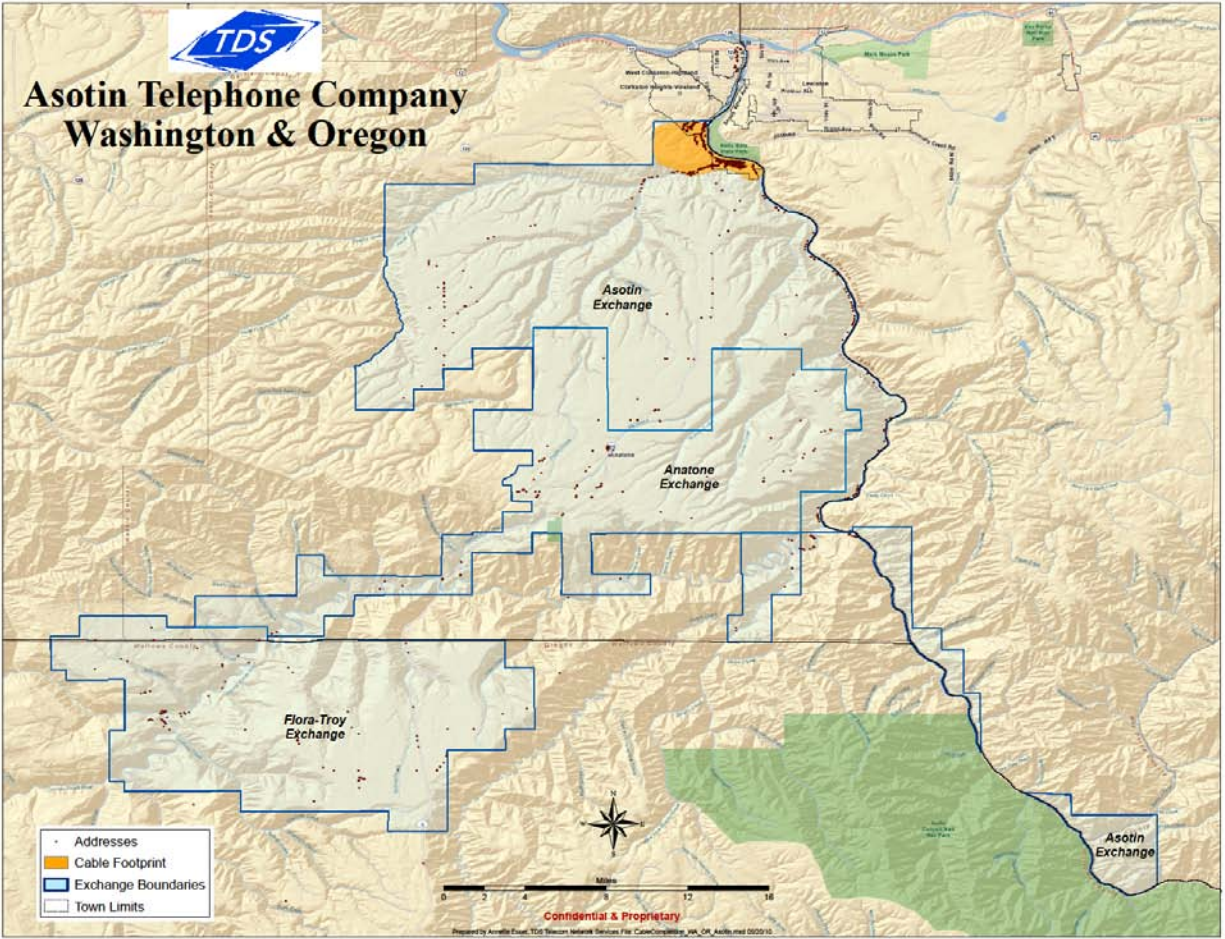


Oregon ILEC Loop Loss
(2005-2010)

Company	2005 Working Loops*	2010 Working Loops*	Number Lost	% Loss
Asotin	143	137	6	4.20%
Beaver Creek	4,602	4,214	388	8.43%
Canby	11,380	10,090	1,290	11.34%
Cascade	9,644	8,346	1,298	13.46%
CenturyLink	74,705	59,528	15,177	20.32%
Clear Creek	3,806	3,313	493	12.95%
Colton	1,266	1,084	182	14.38%
Eagle	479	465	14	2.92%
Gervais	1,175	908	267	22.72%
Helix	337	284	53	15.73%
Home	872	750	122	13.99%
Midvale	253	244	9	3.56%
Molalla	6,631	5,745	886	13.36%
Monitor	756	638	118	15.61%
Monroe	1,038	919	119	11.46%
Mt. Angel	2,037	1,813	224	11.00%
Nehalem	3,369	2,966	403	11.96%
North-State	552	486	66	11.96%
Oregon-Idaho	735	676	59	8.03%
Oregon Tel	1,863	1,685	178	9.55%
People's	1,524	1,232	292	19.16%
Pine	981	987	-6	-0.61%
Pioneer	15,910	13,864	2,046	12.86%
Roome	692	644	48	6.94%
St. Paul	653	605	48	7.35%
Scio	1,901	1,674	227	11.94%
Stayton	7,921	6,454	1,467	18.52%
Trans-Cascades	229	200	29	12.66%
United (CenturyLink)	71,723	56,785	14,938	20.83%
Verizon	444,636	317,402	127,234	28.62%
Malheur	13,151	10,979	2,172	16.52%
Citizens	14,599	12,410	2,189	14.99%
Qwest	1,304,393	891,427	412,966	31.66%
TOTAL	2,003,956	1,418,954	585,002	29.19%

*Source: USAC Report HC05 for 1st Quarter 2005 and 1st Quarter 2010.





CERTIFICATE OF SERVICE
UM 1481

I hereby certify that I served the attached letter to the Filing Center upon all parties of record in this proceeding by U.S. mail and electronic mail, pursuant to OAR 860-013-0070, unless otherwise specified, to the following parties or attorneys of parties:

CHARLES L. BEST
1631 NE BROADWAY #538
PORTLAND, OR 97232-1425
chuck@charleslbest.com
VIA E-MAIL ONLY

CYNTHIA MANHEIM
AT&T
PO BOX 97061
REDMOND, WA 98052
cindy.manheim@att.com
VIA E-MAIL ONLY

DAVID COLLIER
AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST INC.
david.collier@att.com
VIA E-MAIL ONLY

SHARON L. MULLIN
AT&T SERVICES, INC.
DIRECTOR-EXTERNAL AFFAIRS
400 W 15TH ST, STE 930
AUSTIN, TX 78701
slmullin@att.com
VIA E-MAIL ONLY

GORDON FEIGHNER, ENERGY
ANALYST
CITIZENS' UTILITY BOARD OF OR
610 SW BROADWAY, SUITE 308
PORTLAND, OR 97205
gordon@oregoncub.org
VIA E-MAIL ONLY

ROBERT JENKS, EXECUTIVE
DIRECTOR
CITIZENS' UTILITY BOARD OF OR
610 SW BROADWAY, SUITE 308
PORTLAND, OR 97205
bob@oregoncub.org
VIA E-MAIL ONLY

G. CATRIONA MCCrackEN
LEGAL COUNSEL/STAFF ATTY
CITIZENS' UTILITY BOARD OF OR
610 SW BROADWAY, SUITE 308
PORTLAND, OR 97205
catriona@oregoncub.org
VIA E-MAIL ONLY

RAYMOND MYERS, ATTORNEY
CITIZENS' UTILITY BOARD OF OR
610 SW BROADWAY, SUITE 308
PORTLAND, OR 97205
ray@oregoncub.org
VIA E-MAIL ONLY

1
2 KEVIN ELLIOTT PARKS, STAFF
3 ATTORNEY
4 CITIZENS' UTILITY BOARD OF OR
5 610 SW BROADWAY, SUITE 308
6 PORTLAND, OR 97205
7 kevin@oregoncub.org
8 **VIA E-MAIL ONLY**

MICHAEL T. WEIRICH, ASSISTANT
ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS
SECTION
1162 COURT ST NE
SALEM, OR 97301-4096
michael.weirich@doj.state.or.us

7 ROGER WHITE, PROGRAM MANAGER
8 PUBLIC UTILITY COMMISSION OF
9 OREGON
10 PO BOX 2148
11 SALEM, OR 97308
12 roger.white@state.or.us

ARTHUR BUTLER
ATER WYNNE LLP
601 UNION STREET, STE 1501
SEATTLE, WA 98101-3981
aab@aterwynne.com
VIA E-MAIL ONLY

11 ROGER T. DUNAWAY
12 ATER WYNNE LLP
13 601 UNION STREET, STE 1501
14 SEATTLE, WA 98101-3981
15 rtd@aterwynne.com
16 **VIA E-MAIL ONLY**

JACK PHILLIPS
FRONTIER COMMUNICATIONS OF
AMERICA
14450 BURNHAVEN DRIVE
BURNSVILLE, MN 55306
Jack.phillips@frontiercorp.com
VIA E-MAIL ONLY

17 INGO HENNINGSEN
18 MANAGER, GOVERNMENT &
19 EXTERNAL AFFAIRS
20 FRONTIER COMMUNICATIONS OF
21 AMERICA INC.
22 4064 LISA DRIVE
23 SALT LAKE CITY, UT 84124-2118
24 ingo.henningsen@frontiercorp.com
25 **VIA E-MAIL ONLY**

ADAM L. SHERR
QWEST CORPORATION
1600 7TH AVENUE, ROOM 1506
SEATTLE, WA 98191
adam.sherr@qwest.com

26 MARK REYNOLDS
QWEST CORPORATION
1600 7TH AVE ROOM 3206
SEATTLE, WA 98191
mark.reynolds3@qwest.com

WILLIAM E. HENDRICKS
CENTURYLINK, INC.
805 BROADWAY ST
VANCOUVER, WA 98660-3277
tre.hendricks@centurylink.com

CERTIFICATE OF SERVICE - 2

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, WA 98512
(360) 956-7001

1
2 DOUG COOLEY
3 GOVERNMENT AFFAIRS MANAGER
4 COMCAST BUSINESS
5 COMMUNICATIONS LLC
6 1710 SALEM INDUSTRIAL DRIVE NE
7 SALEM, OR 97303
8 doug_cooley@cable.comcast.com

9 MARK TRINCHERO
10 DAVIS WRIGHT TREMAINE LLP
11 1300 SW FIFTH AVE STE 2300
12 PORTLAND, OR 97201-5682
13 marktrinchero@dwt.com

14 RENEE WILLER, EXTERNAL AFFAIRS
15 MANAGER
16 FRONTIER COMMUNICATIONS OF
17 AMERICA
18 20575 NW VON NEUMANN DR
19 BEAVERTON, OR 97006-6982
20 renee.willer@ftr.com
21 **VIA E-MAIL ONLY**

22 CARSTEN KOLDSBAEK
23 CONSULTING MANAGER
24 GVNW INC.
25 8050 SW WARM SPRINGS - STE 200
26 TUALATIN, OR 97062
ckoldsbaek@gvnw.com

THEODORE N. GILLIAM
SENIOR CORPORATE COUNSEL
INTEGRA TELECOM, INC.
1201 NE LLOYD BLVD STE 500
PORTLAND, OR 97232
tgilliam@integratelecom.com
VIA E-MAIL ONLY

MARSHA SPELLMAN
CONVERGE COMMUNICATIONS
10425 SW HAWTHORNE LN
PORTLAND, OR 97225
marsha@convergecomm.com

BARBARA YOUNG
EMBARQ COMMUNICATIONS INC.
902 WASCO ST - ORHDRA0305
HOOD RIVER, OR 97031-3105
barbara.c.young@centurylink.com
VIA E-MAIL ONLY

JEFFRY H. SMITH
VICE PRESIDENT & DIVISION
MANAGER
GVNW CONSULTING INC.
8050 SW WARM SPRINGS - STE 200
TUALATIN, OR 97062
jsmith@gvnw.com

DOUGLAS K. DENNEY
INTEGRA TELECOM OF OREGON INC.
6160 GOLDEN HILLS DR
GOLDEN VALLEY, MN 55416-1020
dkdenney@integratelecom.com
VIA E-MAIL ONLY

MICHAEL DEWEY
EXECUTIVE DIRECTOR
OREGON CABLE AND
TELECOMMUNICATIONS ASSN
1249 COMMERCIAL ST SE
SALEM, OR 97302
mdewey@oregoncable.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

MILT H. DOUMIT, DIRECTOR -
STATE GOVT RELATIONS
VERIZON
410 - 11TH AVE SE, STE 103
OLYMPIA, WA 98501
milt.h.doumit@verizon.com

THOMAS F. DIXON
ASST GENERAL COUNSEL
VERIZON CORPORATE SERVICES
707 17TH ST #4200
DENVER, CO 80202
thomas.f.dixon@verizon.com

ADAM HAAS
WSTC
10425 SW HAWTHORNE LN
PORTLAND, OR 97225
adamhaas@convergecomm.com

CRAIG PHILLIPS
OREGON EXCHANGE CARRIER ASSN
800 C ST
VANCOUVER, WA 98660
cphillips@oecca.com

Dated at Olympia, WA this 19th day of July, 2010.

By: 

RICHARD A. FINNIGAN, OSB No. 965357
Attorney for the Oregon Telecommunications
Association

CERTIFICATE OF SERVICE - 4

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, WA 98512
(360) 956-7001