



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

**McDOWELL RACKNER & GIBSON PC**  
ADAM LOWNEY  
419 SW 11TH AVE. STE. 400  
PORTLAND, OR 97205  
Telephone: 503-595-3926  
Email: adam@mcd-law.com

3.

Comspan is a Competitive Local Exchange Carrier ("CLEC") providing service to customers in Oregon. Comspan is also an Eligible Telecommunications Carrier ("ETC") and Eligible Telecommunications Provider ("ETP") in Oregon.

4.

Comspan has a substantial interest in this proceeding because it is a contributor to the Oregon Universal Service Fund and Comspan will likely be materially affected by the outcome of the docket.

5.

The evidence, if any, and briefing presented by Comspan will be of material value to the Commission in its determination of the issues involved in this proceeding, and Comspan's intervention will not broaden those issues or delay the proceedings.

6.

Comspan acknowledges that this petition is untimely. However, it was not until Staff's Straw Proposal was filed on April 4, 2011, that Comspan became aware of the issues being addresses in this docket. Because granting this petition at this time is unlikely to prejudice any other party to this docket and because of the potentially significant impact on Comspan's business, Comspan respectfully requests that its Petition to Intervene be granted.

/////  
/////  
/////

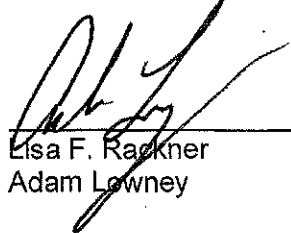
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**CONCLUSION**

For all of the above reasons, Comspan's Petition to Intervene should be granted.

DATED: April 25, 2011.

**MCDOWELL RACKNER & GIBSON PC**



---

Lisa F. Rackner  
Adam Lowney

**COMSPAN COMMUNICATIONS, INC.**  
TIM SPANNRING  
OPERATIONS MANAGER  
278 NW GARDEN VALLEY BLVD.  
ROSEBURG, OR 97470  
Telephone: 541-229-2122  
Email: tims@comspancomm.com