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May 21, 2010

VIA ELECTRONIC MAIL AND U.S. MAIL

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

Re: UM 1481 - Petition to Intervene - Oregon Telecommunications

Association

Dear Sir/Madam:

Enclosed are the Petition to Intervene of the Oregon Telecommunications Association and Certificate of Service.

Sinceré.

Thank you for your attention to this matter.

RICHARD A. FINNIGAN

RAF/km Enclosures

cc: Service List (via U.S. mail)

Member Companies (via e-mail)

Brant Wolf (via e-mail)

1 2 3 4 BEFORE THE PUBLIC UTILITY COMMISSION 5 OF OREGON 6 UM 1481 7 In the Matter of 8 PUBLIC UTILITY COMMISSION OF PETITION TO INTERVENE OF THE 9 **OREGON** OREGON TELECOMMUNICATIONS 10 ASSOCIATION Staff investigation of the Oregon Universal 11 Service Fund. 12 13 Pursuant to OAR 860-013-0021, the Oregon Telecommunications Association ("OTA") submits this Petition to Intervene in the above-referenced docket. 14 Name and address of the Petitioner: 1. 15 Oregon Telecommunications Association 16 777 13th Street SE, Suite 120 Salem, OR 97301 17 18 2. Name and address of attorney: 19 Richard A. Finnigan 2112 Black Lake Blvd. SW 20 Olympia, WA 98512 21 3. In addition, OTA requests the following representative on the service list: 22 **Brant Wolf** 23 Oregon Telecommunications Association 777 13th Street SE, Suite 120 24 Salem, OR 97301 25 26

PETITION TO INTERVENE - 1

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CERTIFICATE OF SERVICE UM 1481

2 I hereby certify that I served the attached Petition to Intervene of the Oregon 3 Telecommunications Association 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 4 or attorneys of parties: 5 GORDON FEIGHNER, ENERGY ROBERT JENKS, EXECUTIVE 6 ANALYST DIRECTOR CITIZENS' UTILITY BOARD OF OR CITIZENS' UTILITY BOARD OF OR 7 610 SW BROADWAY, SUITE 308 610 SW BROADWAY, SUITE 308 PORTLAND, OR 97205 PORTLAND, OR 97205 bob@oregoncub.org gordon@oregoncub.org VIA E-MAIL ONLY VIA E-MAIL ONLY 9 10 G. CATRIONA MCCRACKEN RAYMOND MYERS, ATTORNEY LEGAL COUNSEL/STAFF ATTY CITIZENS' UTILITY BOARD OF OR 11 CITIZENS' UTILITY BOARD OF OR 610 SW BROADWAY, SUITE 308 610 SW BROADWAY, SUITE 308 PORTLAND, OR 97205 12 PORTLAND, OR 97205 ray@oregoncub.org VIA E-MAIL ONLY catriona@oregoncub.org 13 VIA E-MAIL ONLY 14 MICHAEL T. WEIRICH, ASSISTANT KEVIN ELLIOTT PARKS, STAFF 15 ATTORNEY ATTORNEY GENERAL REGULATED UTILITY & BUSINESS CITIZENS' UTILITY BOARD OF OR 16 610 SW BROADWAY, SUITE 308 **SECTION** PORTLAND, OR 97205 1162 COURT ST NE 17 kevin@oregoncub.org SALEM, OR 97301-4096 VIA E-MAIL ONLY michael.weirich@doj.state.or.us 18 19 ARTHUR BUTLER ROGER WHITE, PROGRAM MANAGER PUBLIC UTILITY COMMISSION OF ATER WYNNE LLP 20 **OREGON** 601 UNION STREET, STE 1501 SEATTLE, WA 98101-3981 PO BOX 2148 21 **SALEM, OR 97308** aab@aterwynne.com roger.white@state.or.us VIA E-MAIL ONLY 22

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2 3 4 5	ROGER T. DUNAWAY ATER WYNNE LLP 601 UNION STREET, STE 1501 SEATTLE, WA 98101-3981 rtd@aterwynne.com VIA E-MAIL ONLY	JACK PHILLIPS FRONTIER COMMUNICATIONS OF AMERICA 14450 BURNHAVEN DRIVE BURNSVILLE, MN 55306 Jack.phillips@frontiercorp.com
6		VIA E-MAIL ONLY
7	INGO HENNINGSEN MANAGER, GOVERNMENT &	ALEX DUARTE CORPORATE COUNSEL
8	EXTERNAL AFFAIRS FRONTIER COMMUNICATIONS OF	QWEST CORPORATION 421 SW OAK ST STE 810
9	AMERICA INC. 4064 LISA DRIVE	PORTLAND, OR 97204 alex.duarte@qwest.com
10	SALT LAKE CITY, UT 84124-2118 ingo.henningsen@frontiercorp.com	
11	VIA E-MAIL ONLY	
12	MARK REYNOLDS	
13	QWEST CORPORATION 1600 7TH AVE ROOM 3206	
14	SEATTLE, WA 98191 mark.reynolds3@qwest.com	
15	Dated at Olympia, WA this 21st day	of May, 2010 / /
16		(he call A)
17	By:	RICHARD A. FINNIGAN, OSB No. 965357
18		Attorney for Petitioner
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26		Law Office of

PETITION TO INTERVENE - 4

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