

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1522

In the Matter of)	
)	NOTICE OF INTERVENTION
VIRGIN MOBILE USA, L.P.,)	(ORS 774.180) OF THE CITIZENS'
)	UTILITY BOARD OF OREGON
)	
Petition for Limited Designation as an Eligible)	
Telecommunications Carrier.)	
_____)	

Pursuant to ORS 774.180 and OAR 860-001-0300 The Citizens' Utility Board of Oregon (CUB) hereby files this Notice of Intervention and Waiver of Paper Service in this proceeding. Pursuant to ORS 774.180, CUB may intervene in Commission proceedings as of right. In support of this notice of intervention, CUB provides the following information:

- a. The name and address of Intervenor Citizens' Utility Board of Oregon (CUB) is:

Citizens' Utility Board of Oregon
610 SW Broadway Ste 400
Portland, OR 97205
(503) 227-1984

- b. The name and address of the attorney representing CUB is:

G. Catriona McCracken
Staff Attorney
Citizens' Utility Board of Oregon
610 SW Broadway Ste 400
Portland, OR 97205
(503) 227-1984
Catriona@oregoncub.org

- c. CUB requests that service of documents also be made on:

Bob Jenks
Executive Director
Citizens' Utility Board of Oregon
610 SW Broadway Ste 400
Portland, OR 97205
(503) 227-1984
Bob@OregonCUB.org

Gordon Feighner
Utility Analyst
Citizens' Utility Board of Oregon
610 SW Broadway Ste 400
Portland, OR 97205
(503) 227-1984
Gordon@OregonCUB.org

- d. Legislation creating the Citizens' Utility Board of Oregon (CUB) was enacted into law in 1985. CUB was created to ensure that utility consumers have an effective advocate to reflect their needs and interests when it comes to public policies affecting the quality and price of utility services. ORS 774.020. CUB's membership averages 4,500 persons per year.
- e. CUB intends to monitor the proceeding and, if necessary, raise issues that are appropriate to the proceeding. No other party could adequately represent the interest of utility consumers.
- f. CUB has participated in Commission proceedings since its inception in 1985.

Dated this 16th day of February, 2011.

Respectfully submitted,



John C. Sturm, OSB #105174
Staff Attorney
Citizens' Utility Board of Oregon
610 SW Broadway Ste 400
Portland, OR 97205
(503) 227-1984
john@oregoncub.org

UM 1522 – CERTIFICATE OF SERVICE

I hereby certify that, on this 16th day of February, 2011, I served the foregoing **NOTICE OF INTERVENTION (ORS 774.180) OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UM 1522 upon each party listed in the UM 1522 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

W PUBLIC UTILITY COMMISSION
KAY MARINOS
PO BOX 2148
SALEM OR 97308-2148
kay.marinos@state.or.us

W DEPARTMENT OF JUSTICE
PAUL GRAHAM
BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
paul.graham@state.or.us

**W SKADDEN ARPS SLATE
MEAGHER & FLOM LLP**
JOHN BEAHN
1440 NEW YORK AVE NW
WASHINGTON DC 20005-2111
john.beahn@skadden.com

W VIRGIN MOBILE USA LLC
EVELYN DIVELBLISS
10 INDEPENDENCE BLVD
WARREN NJ 07059
elaine.divelbliss@virginmobileusa.com

Respectfully submitted,



John C. Sturm, OSB #105174
Staff Attorney
Citizens' Utility Board of Oregon
610 SW Broadway Ste 400
Portland, OR 97205
(503) 227-1984
john@oregoncub.org