

ELLEN F. ROSENBLUM
Attorney General



FREDERICK M. BOSS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

October 23, 2015

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem OR 97308-1088

Re: **UM 1648 ETC Requirements**
Staff's Motion to Admit Third Partial Stipulation and Joint Testimony
DOJ File No.: 860105-GB0226-13

Attention Filing Center:

Enclosed for filing in this matter is STAFF'S MOTION TO ADMIT THIRD PARTIAL STIPULATION AND JOINT TESTIMONY, along with supporting affidavits. The supporting affidavits of Kim Lehrman and Marsha Spellman will be submitted separately.

Thank you for your assistance in this matter.

Sincerely,

Johanna M. Riemenschneider
for

Johanna M. Riemenschneider
Senior Assistant Attorney General
Of Attorneys for Staff of the Public
Utility Commission of Oregon

Enclosures
JMR:mxg/#6885020
(Electronic copy only)
c: UM 1648 Service list

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1648**

4 In the Matter of

5 Staff Investigation into Eligible
6 Telecommunications Carriers' Requirements.

STAFF'S MOTION TO ADMIT
THIRD PARTIAL STIPULATION AND
JOINT TESTIMONY


7 Pursuant to OAR 860-001-0350(7), Staff, on behalf of the stipulating parties to the
8 Stipulation filed in this docket, moves for admission of the Third Partial Stipulation into the record as
9 evidence in this proceeding.

10 Staff, on behalf of the stipulating parties, also moves for admission of the Joint Testimony in
11 support of the Stipulation into the record as evidence in this proceeding. The Stipulating Parties'
12 testimony was filed as Exhibit Stipulating Parties/200 with attached supporting exhibits Joint/201-
13 203. The supporting affidavits of Bob Jenks, Kay Marinos, and Brant Wolf, attesting to the truth and
14 accuracy of the joint testimony are attached. The supporting affidavits of Kim Lehrman and Marsha
15 Spellman will be submitted separately.

16 DATED this 23rd day of October 2015.

17
18 Respectfully submitted,

19 ELLEN F. ROSENBLUM
20 Attorney General

21 
22 *Johanna M. Riemenschneider, #990083* 054094
23 *for* Assistant Attorneys General
24 Of Attorneys for Staff of the Public
25 Utility Commission of Oregon
26

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1648**

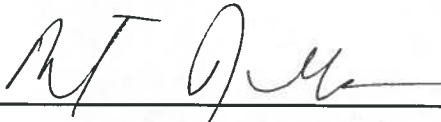
In the Matter of)
)
)
PUBLIC UTILITY COMMISSION OF)
OREGON) **AFFIDAVIT OF ROBERT (BOB) JENKS**
)
Staff Investigation into Eligible)
Telecommunications Carriers' Requirements)
_____)

I, Robert (Bob) Jenks, being duly sworn on oath, depose and say:

1. My name is Robert (Bob) Jenks. I am the Executive Director of the Citizens' Utility Board of Oregon (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205.
2. I co-sponsored Stipulating Parties/200-203 on behalf of the Stipulating Parties.
3. My Testimony that was previously filed is true and accurate. My testimony would be the same today as that reflected in my pre-filed testimony.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF OREGON THAT THE FOREGOING IS TRUE AND CORRECT BASED ON MY INFORMATION AND BELIEF.

Signed this 21 day of October, 2015.



Robert (Bob) Jenks



Subscribed and sworn to before me this 21 day of October, 2015.

Signed: 

Printed: Leslie A. Murray
My Commission expires: November 16, 2018

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1648

In the Matter of
Staff Investigation into Eligible
Telecommunications Carriers' Requirements.

AFFIDAVIT OF KAY MARINOS

STATE OF OREGON)
County of Marion) ss

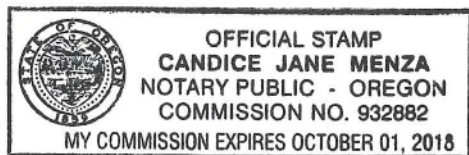
I, KAY MARINOS, hereby depose and say:

1. I am a Program Manager in the Telecommunications and Water Division of the Public Utility Commission of Oregon ("Commission").
2. On behalf of Commission Staff, I prepared joint testimony that was filed by the stipulating parties in support of the Third Partial Stipulation in this docket as Exhibit Stipulating Parties/200. Previously in this docket, I prepared my witness qualification statement, which was filed as Exhibit Stipulating Parties/101.
3. To the best of my knowledge, the joint testimony and my witness qualification statement are true and accurate.

DATED the 16th of October 2015.

Kay Marinoss
KAY MARINOS

SUBSCRIBED AND SWORN TO before me this 16th day of October 2015.



Candice Jane Menza
NOTARY PUBLIC FOR OREGON
My Commission Expires: October 1, 2018

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1648

In the Matter of

Staff Investigation into Eligible
Telecommunications Carriers' Requirements.

AFFIDAVIT OF BRANT WOLF

STATE OF OREGON)
) ss
County of Marion)

I, Brant Wolf, hereby depose and say:

1. I am Executive Vice President of and employed by the Oregon Telecommunications Association (OTA).
2. On behalf of OTA, I prepared joint testimony that was filed by the stipulating parties in support of the Third Partial Stipulation in this docket as Exhibit Stipulating Parties/200. Previously in this docket, I prepared my witness qualification statement, which was filed as Exhibit Stipulating Parties/102.
3. To the best of my knowledge, the joint testimony and my witness qualification statement are true and accurate.

DATED the 23rd of October 2015.

Brant Wolf
Brant Wolf

SUBSCRIBED AND SWORN TO before me this 23rd day of October 2015.



Diane Brenda Davis
NOTARY PUBLIC FOR OREGON
My Commission Expires: 04-24-2018