



David Collier
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March 21, 2013

Allan Arlow, ALJ
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: UM 1648

Dear Judge Arlow:

Enclosed for filing in the above entitled matter, please find an original and one (1) copy of the Petition to Intervene, including Certificate of Service, of AT&T Corp., Teleport Communications America LLC, AT&T Mobility LLC and its subsidiaries operating in Oregon.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/

David Collier
Area Manager

attachment

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF OREGON**

UM 1648

In the Matter of)	
)	PETITION TO INTERVENE BY
PUBLIC UTILITY COMMISSION OF)	AT&T
OREGON)	
)	
Staff Investigation into Eligible)	
Communication Carriers' Requirements)	
_____)	

AT&T Corp., Teleport America, LLC, and AT&T Mobility Wireless Operations Holdings Inc. and its subsidiaries operating in Oregon (collectively "AT&T") hereby submit this Petition to Intervene pursuant to OAR 860-012-0001 in the above-referenced docket.

I. Name and Address of Petitioners

AT&T Corp.
One AT&T Way, Room 2B115E, Bedminster, NJ 07921

Teleport Communications America LLC
One AT&T Way, Room 2B115E, Bedminster, NJ 07921

AT&T Mobility LLC
1025 Lenox Park Blvd. NE, Atlanta, GA 30319

II. Name and Address of Petition's Attorney and Representative

Petitioner will be represented in this proceeding by the following attorney:

Ann Sagerson
General Attorney
AT&T
208 S. Akard Street
Dallas, TX 75202-4206
(214) 782-3748 (telephone)
(214)746-2213 (facsimile)
ann.sagerson@att.com

In addition, AT&T requests that the following representatives be on the service list:

Sharon L. Mullin
Director – External Affairs
AT&T Services, Inc.
2003 Point Bluff
Austin, TX 78746-6236
(512) 330-1698 (telephone)
(832) 213-0203 (facsimile)
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David Collier
Area Manager – Regulatory Relations
AT&T Services, Inc.
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Please note that petitioner's attorney and other representatives all waive paper service.

III. Nature and Extent of Petitioner's Interest in This Proceeding

This docket is a request for investigation into the issue of Eligible Communication Carrier (ETC) requirements, specifically to review and consider updates to its requirements for initial designation and annual recertification of telecommunications carriers eligible to receive Federal Universal Service Fund (FUSF) support. Staff indicates that such a review is necessitated by recent changes in requirements mandated by the Federal Communications Commission (FCC) and may reduce regulatory burdens on Oregon carriers.

AT&T has a direct and substantial interest in the outcome of this issue and has been actively involved in this issue before the FCC. As such, AT&T has an interest to make sure that this application is resolved in a reasonable, competitively neutral and nondiscriminatory manner.

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IV. Issues the Petitioner intends to raise at the Proceeding

AT&T generally intends to address or comment on various issues raised in this docket related to the designation and annual recertification of telecommunications carriers eligible to receive FUSF support.

V. Special Knowledge or Expertise of the Petitioner that would assist the Commission in resolving the Issues in this Proceeding

AT&T has commented in FCC proceedings regarding requirements applicable to ETCs and the issue has impacted other states where AT&T is active. AT&T ILECs are ETCs in 22 states and AT&T Mobility is an ETC in 16 states including Oregon, plus Puerto Rico. AT&T's knowledge and expertise regarding this issue will help the Commission to have more information available in making a well-informed decision.

Based on the information provided above, and in accordance with the Commission's rules of procedure, AT&T requests to participate in this proceeding as an intervenor. AT&T's participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Dated: March 21, 2013

AT&T Corp., Teleport Communications
America LLC, AT&T Mobility LLC

/s/ _____
Ann Sagerson
208 S. Akard Street
Dallas, TX 75202-4206
ann.sagerson@att.com
(214) 782-3748 (telephone)
(214)746-2213 (facsimile)

CERTIFICATE OF SERVICE

UM 1648

I hereby certify that on the 21st day of March, 2013, I served the foregoing Petition to Intervene by AT&T in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at the address shown below, or via email only if the service list indicates such persons waive paper service.

<p>Kay Marinos (W) Public Utility Commission of Oregon PO Box 2148 Salem, OR 97308-2148 kay.marinos@state.or.us</p>	<p>CHARLES L BEST (W) ATTORNEY AT LAW 1631 NE BROADWAY #538 PORTLAND OR 97232-1425 charlesbestlaw@q.com</p>
<p>ROBIN ENKEY (W) Budget Prepay, Inc. 1325 BARKSDALE BLVD BOSSIER CITY LA 71111 robine@budgetprepay.com</p>	<p>RON L TRULLINGER (W) CenturyLink 310 SW PARK AVE 11TH FL PORTLAND OR 97205 ron.trullinger@centurylink.com</p>
<p>WILLIAM E HENDRICKS (W) CenturyLink, Inc. 902 WASCO ST A0412 HOOD RIVER OR 97031 tre.hendricks@centurylink.com</p>	<p>OPUC DOCKETS (W) Citizen's Utility Board of Oregon 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org</p>
<p>ROBERT JENKS (W) Citizen's Utility Board of Oregon 610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org</p>	<p>G. CATRIONA MCCracken (W) Citizen's Utility Board of Oregon 610 SW BROADWAY, STE 400 PORTLAND OR 97205 catriona@oregoncub.org</p>
<p>JULIE BUECHLER (W) Cricket Communications Inc. 5887 COPLEY DR SAN DIEGO OR 92111 jubuechler@cricketcommunications.com</p>	<p>MARK P TRINCHERO (W) Davis Wright Tremaine LLP 1300 SW FIFTH AVE STE 2300 PORTLAND OR 97201-5682 marktrincherodwt.com</p>
<p>RICHARD A FINNIGAN (W) Law Office of Richard A Finnigan 2112 BLACK LAKE BLVD SW OLYMPIA WA 98512 rickfinn@localaccess.com</p>	<p>TODD B LANTOR (W) Lukas, Nace, Gutierrez & Sachs 8300 GREENSBORO DR, #1200 MCLEAN VA 22102 tlantor@fcclaw.com</p>

<p>BROOKS HARLOW (W) Lukas, Nace, Gutierrez & Sachs LLP 8300 GREENSBORO DRIVE, STE 1200 MCLEAN VA 22102 bharlow@fcclaw.com</p>	<p>BRANT WOLF (W) Oregon Telecommunications Assn 777 13TH ST SE - STE 120 SALEM OR 97301-4038 bwolf@ota-telecom.org</p>
<p>TERI OHTA (W) T-Mobile USA Inc 12920 SE 38TH ST BELLEVUE WA 98006 teri.ohta@t-mobile.com</p>	<p>STEPHANIE CASSIOPPI (W) United States Cellular Corp. 8410 WEST BRYN MAWR AVENUE CHICAGO IL 60631-3486 stephanie.cassioppi@uscellular.com</p>

(W) = Waive Paper Service

DATED this 21st day of March, 2013

AT&T

By: /s/ _____
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