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March 20, 2013

VIA UPS OVERNIGHT MAIL

Oregon Public Utility Commission
Attn: Filing Center
P.O. Box 2148
550 Capitol Street NE, Suite 215
Salem, OR 97308

Re: UM 1648

Dear Commission:

Enclosed for filing, please find an original and one copy of T-Mobile West LLC's Petition to Intervene and Waiver of Paper Service in the above-referenced proceeding, along with a certificate of service.

Please let me know if you have any questions concerning this filing.

Very truly yours,

Davis Wright Tremaine LLP

Alan J. Galloway
Of Attorneys for T-Mobile West LLC

AJG/cap
Enclosures
cc: Service List

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

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF OREGON,)	T-MOBILE WEST LLC'S
)	PETITION TO INTERVENE
Staff Investigation into Eligible)	AND WAIVER OF PAPER
Communication Carriers' Requirements)	SERVICE
)	

**PETITION TO INTERVENE OF
T-MOBILE WEST LLC
AND WAIVER OF PAPER SERVICE**

T-Mobile West LLC ("T-Mobile") hereby respectfully petitions the Public Utility Commission of Oregon ("Commission") for leave to intervene in the above-captioned proceeding.

In support of its petition, T-Mobile states as follows:

I.

T-Mobile's name and address are:

T-Mobile West LLC
12920 SE 38th Street
Bellevue, Washington 98006

II.

All correspondence in this matter should be directed to:

Teri Y. Ohta
Principal Corporate Counsel, State Regulatory
Affairs
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
Telephone: 425-383-5532
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III.

T-Mobile has an interest in the subject matter of this proceeding. T-Mobile is a facilities-based commercial mobile radio service (“CMRS”) provider in Oregon. T-Mobile was designated as an Eligible Telecommunications Carrier (“ETC”) and Eligible Telecommunications Provider (“ETP”) in Oregon through the Commission’s Order No. 12-422 in Docket No. UM 1511, on November 1, 2012,¹ reflecting the initial designation requirements established by Order No. 06-292 in Docket No. UM 1217.² T-Mobile’s status as an ETC currently requires annual recertification filings with the Commission. The requirements for those filings, and for recertification, are among the issues identified for consideration in this docket. T-Mobile would be directly impacted by any change in policies or requirements adopted by the Commission concerning the annual recertification process. T-Mobile therefore submits this Petition to Intervene because it is materially interested in, and will be substantially affected by, the Commission’s resolution of the issues presented in this proceeding.

¹ *In the Matter of T-MOBILE WEST LLC Application for Designation as an Eligible Telecommunications Carrier and Request for Supplemental Certification on Use of Funds*, Oregon Public Utility Commission Docket No. UM 1511, Order No. 12-422 (entered Nov. 1, 2012).

² *In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Investigation to Establish Requirements for Initial Designation and Recertification of Telecommunications Carriers Eligible to Receive Federal Universal Service Support*, Oregon Public Utility Commission Docket No. UM 1217, Order No. 06-292 (entered June 13, 2006).

IV.

T-Mobile expects to participate in the docket and to contribute its perspective as a CMRS ETC to the investigation. T-Mobile will address such issues as it deems relevant in this proceeding.

V.

T-Mobile has knowledge and expertise that will assist the Commission and the parties in addressing the issues presented in this proceeding.

VI.

T-Mobile's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

VII.

T-Mobile waives paper service in this proceeding.

CONCLUSION

For the reasons stated above, T-Mobile respectfully requests that its Petition to Intervene be granted.

DATED this 20th day of March, 2013.

DAVIS WRIGHT TREMAINE LLP

By: _____

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Attorneys for T-Mobile West LLC

**UM 1648
CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2013, the foregoing **PETITION TO INTERVENE OF T-MOBILE WEST LLC AND WAIVER OF PAPER SERVICE** was sent by UPS Overnight Mail to the Oregon Public Utilities Commission, 550 Capitol Street NE, #215, Salem OR 97310 and email to puc.filingcenter@state.or.us, and was served on the following persons by email:

**W=Waive Paper service C=Confidential
 HC=Highly Confidential**

W	CHARLES L BEST ATTORNEY AT LAW	1631 NE BROADWAY #538 PORTLAND OR 97232-1425 charlesbestlaw@q.com
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W	BUDGET PREPAY, INC. ROBIN ENKEY	1325 BARKSDALE BLVD BOSSIER CITY LA 71111 robine@budgetprepay.com
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W	CENTURYLINK RON L TRULLINGER MANAGER - OREGON REGULATORY	310 SW PARK AVE 11TH FL PORTLAND OR 97205 ron.trullinger@centurylink.com
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W	CENTURYLINK, INC. WILLIAM E HENDRICKS ATTORNEY	902 WASCO ST A0412 HOOD RIVER OR 97031 tre.hendricks@centurylink.com
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W	CITIZENS' UTILITY BOARD OF OREGON OPUC DOCKETS	610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org
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	ROBERT JENKS	610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org
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