

March 25, 2013

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

Re: UM-1648 – Petition to Intervene and Waiver of Paper Service
of YourTel America Inc.

Enclosed are the original and 2 copies of the document referenced above. This document was e-filed today with the Commission. Please let me know if you have any questions.

Very truly yours,

ATER WYNNE LLP



Susan Carpenter
Assistant to Arthur A. Butler

Enclosures
cc: Parties of Record

1638851/1/SMA/050680-0055

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3 **BEFORE THE PUBLIC UTILITY COMMISSION**
4 **OF OREGON**
5 **UM 1648**

6 In the Matter of
7 PUBLIC UTILITY COMMISSION OF
8 OREGON,
9 Staff Investigation into Eligible
10 Communication Carriers' Requirements

PETITION TO INTERVENE
& WAIVER OF PAPER SERVICE OF
YOURTEL AMERICA INC.

11 YourTel America Inc. ("YourTel") respectfully petitions to intervene in this proceeding
12 and gives notice of its intent to participate as a full party.

13 In support of this petition, YourTel states as follows:

- 14 1. The name and address of the petitioner is:

15 YourTel America Inc.
16 2800 East 18th Street
17 Kansas City MO 64127

- 18 2. The name and addresses of the attorneys representing the petitioner are:

19 Arthur A. Butler (*pro hac vice*)
20 Ater Wynne LLP
21 601 Union Street, Suite 1501
22 Seattle, WA 98101-3981
23 aab@aterwynne.com
24 Phone: 206.623.4711
25 Fax: 206.467.8406

1 Joel R. Paisner
2 Ater Wynne LLP
3 601 Union Street, Suite 1501
4 Seattle, WA 98101-3981
5 jrp@aterwynne.com
6 Phone: 206.623.4711
7 Fax: 206.467.8406

8 3. YourTel is a competitive telecommunications provider specializing in the
9 provision of high quality telecommunications services to low income consumers. YourTel
10 provides both landline and wireless service to well over 300,000 customers as an Eligible
11 Telecommunications Carrier (ETC) in Illinois, Kansas, Maine, Missouri, Oklahoma,
12 Washington, Rhode Island and Pennsylvania. While YourTel is a “Lifeline-only” ETC in these
13 states, its customers are not exclusively Lifeline-supported.

14 4. YourTel has an application pending before the OPUC in Docket UM 1551
15 seeking designation as an ETC eligible to offer Lifeline services using a combination of resold
16 and YourTel’s own facilities. That proceeding has been suspended until YourTel receives
17 approval of a forbearance compliance plan by the FCC. That approval is expected shortly.
18 Given this pending ETC application, YourTel could be directly affected by the outcome of this
19 proceeding and, accordingly, has a stake in the proceeding that justifies granting its
20 intervention petition.


21 5. The participation of YourTel in this proceeding will not unduly broaden the issues
22 or burden the record.

23 Based on the information provided above in accordance with the Commission’s rules of
24 procedure, we request to participate in this proceeding as an intervenor. I or the organization
25 that I represent will not unreasonably broaden the issues, burden the record, or unreasonably
delay the proceeding. OAR 860-012-0001.

RESPECTFULLY SUBMITTED this 25th day of March, 2013.

ATER WYNNE LLP

By:


Arthur A. Butler WSBA # 04678 (*pro hac vice*)
Joel R. Paisner WSBA #100580
601 Union Street, Suite 1501
Seattle, WA 98101-3981
Telephone: (206) 623-4711
Facsimile: (206) 467-8406
E-mail: aab@aterwynne.com
Attorneys for YourTel America Inc.

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CERTIFICATE OF SERVICE

I hereby certify that I have this 25th day of March, 2013, served the foregoing along with the correct number of copies, of the foregoing PETITION TO INTERVENE & WAIVER OF YOURTEL AMERICA INC. in docket UM 1648 upon each party listed in the UM 1648 PUC 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 2 copies by U.S. mail, postage prepaid to the Commission's Salem offices.

- W Charles L. Best
Attorney at Law
1631 NE Broadway #538
Portland OR 97232-1425
charlesbestlaw@q.com
- W AT&T Ann Sagerson
General Attorney
208 S. Akard Street
Dallas, TX 75202
Ann.sagerson@att.com
- W AT&T Services Inc. David Collier
Area Manager, Regulatory
Relations
645 E Plumb LLNM RN C-142
Reno, NV 89502
David.collier@att.com
- W AT&T Services, Inc. Sharon L. Mullin
Director- External Affairs
2003 Point Bluff
Austin, TX 78746-6236
slmullin@att.com
- W Budget Prepay, Inc. Robin Enkey
1325 Barksdale Blvd.
Bossier City, LA 71111
robine@budgetprepay.com
- W CenturyLink Ron L. Trullinger
Manager – Oregon
Regulatory
310 SW Park Ave, 11th Floor
Portland, OR 97205
Ron.trullinger@centurylink.com
- W CenturyLink, Inc. William E. Hendricks
Attorney
902 Wasco St A0412
Hood River, OR 97031
Tre.hendricks@centurylink.com

1	W	Citizens' Utility Board of Oregon	OPUC Dockets	610 SW Broadway, Ste 400 Portland OR 97205 dockets@oregoncub.org
2				
3	W		Robert Jenks	610 SW Broadway, Ste 400 Portland OR 97205 bob@oregoncub.org
4				
5	W		G. Catriona McCracken	610 SW Broadway, Ste 400 Portland OR 97205 catriona@oregoncub.com
6				
7				
8	W	Cricket Communications Inc.	Julie Buechler	5887 Copley Dr San Diego, OR 92111 jubuechler@cricketcommunications.com
9				
10	W	Davis Wright Tremaine LLP	Mark Trincherro	1300 SW Fifth Avenue Ste 2300 Portland OR 97201-5682 marktrincherro@dwt.com
11				
12				
13	W	Law Office of Richard A. Finnigan	Richard A. Finnigan	2112 Black Lake Blvd SW Olympia, WA 98512 rickfinn@localaccess.com
14				
15	W	Lukas, Nace, Gutierrez & Sachs	Todd B. Lantor	8300 Greensboro Dr, #1200 McLean, VA 22102 tlantor@fcclaw.com
16				
17				
18	W		Brooks Harlow	8300 Greensboro Dr, #1200 McLean, VA 22102 Bharlow@fcclaw.com
19				
20	W	Oregon Telecommunications Association	Brant Wolf	777 13 th St SE – STE 120 Salem OR 97301-4038 bwolf@ota-telecom.org
21				
22				
23	W	Public Utility Commission of Oregon	Kay Marinos	PO Box 2148 Salem OR 97308-2148 Kay.marinos@state.or.us
24				
25				

1 **W T-Mobile USA Inc.**

Teri Ohta

12920 SE 38th St
Bellevue, WA 98006
Teri.ohta@t-mobile.com

2
3 **W Nexus Communications, Inc.**

Steven Fenker

3629 Cleveland Avenue, Suite C
Columbus, OH 43223
Sfenker1@earthlink.net

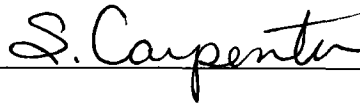
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6 **W**

Alan J. Galloway
Davis Wright Tremaine
LLP

1300 SW Fifth Avenue Ste 2300
Portland OR 97201-5682
alangalloway@dwt.com

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9 I declare under penalty of perjury under the laws of the State of Washington that the
10 foregoing is true and correct.

11 DATED this 25th day of March, 2013, at Seattle, Washington.

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