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March 22, 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 Nexus Communications, Inc.'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 Nexus Communications, Inc.

AJG/cap
Enclosures
cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1648

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF OREGON,)	NEXUS COMMUNICATIONS, INC.’S
)	PETITION TO INTERVENE
Staff Investigation into Eligible)	AND WAIVER OF PAPER
Communication Carriers’ Requirements)	SERVICE

**NEXUS COMMUNICATIONS, INC.’S
PETITION TO INTERVENE AND WAIVER OF PAPER SERVICE**

Nexus Communications, Inc. (“Nexus”) hereby respectfully petitions the Public Utility Commission of Oregon (“Commission”) for leave to intervene in the above-captioned proceeding.

In support of its petition, Nexus states as follows:

I.

Nexus’s name and address are:

Nexus Communications, Inc.
3629 Cleveland Avenue, Suite C
Columbus, OH 43223

II.

All correspondence in this matter should be directed to:

Mr. Steven Fenker
Nexus Communications, Inc.
3629 Cleveland Avenue, Suite C
Columbus, OH 43223
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III.

Nexus has an interest in the subject matter of this proceeding. Nexus currently has an application pending for designation as an Eligible Telecommunications Carrier (“ETC”) in Oregon in Docket No. UM 1533. Nexus’ pending application is currently subject to the initial designation requirements established by Order No. 06-292 in Docket No. UM 1217.¹ Nexus would therefore be directly impacted by any change in policies or requirements adopted by the Commission concerning the certification process. Nexus therefore submits this Petition to Intervene because it is materially interested in, and could be substantially affected by, the Commission’s resolution of the issues presented in this proceeding.

IV.

Nexus expects to participate in the docket and to contribute its perspective as a Lifeline provider and pending applicant for ETC designation in Oregon to the investigation. Nexus will address such issues as it deems relevant in this proceeding.

V.

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

VI.

Nexus’s appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

VII.

Nexus waives paper service in this proceeding.

¹ *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).

CONCLUSION

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

DATED this 21st day of March, 2013.

DAVIS WRIGHT TREMAINE LLP

By: _____

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Attorneys for Nexus Communications, Inc.

**UM 1648
CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2013, the foregoing **NEXUS COMMUNICATIONS, INC.'S PETITION TO INTERVENE 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:

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