

July 31, 2014

Oregon Public Utility Commission
Attn: Filing Center
3930 Fairview Industrial Drive SE
PO Box 1088, Salem, OR 97308.

Re: UM-1686 – Petition to Intervene and Waiver of Paper Service
of Telecommunications Ratepayers Association for Cost-Based and Equitable
Rates (TRACER).

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

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3 **BEFORE THE PUBLIC UTILITY COMMISSION**
4 **OF OREGON**
5 **UM 1686**

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7 In the Matter of the Petition of United
8 Telephone Company of the Northwest,
9 CenturyTel of Oregon, and CenturyTel of
10 Eastern Oregon for Approval of Price Plan
Pursuant to ORS 759.255

PETITION TO INTERVENE
& WAIVER OF PAPER SERVICE OF
TELECOMMUNICATIONS RATEPAYERS
ASSOCIATION FOR COST-BASED AND
EQUITABLE RATES

11 The Telecommunications Ratepayers Association for Cost-based and Equitable Rates
12 (“TRACER”) respectfully petitions to intervene in this proceeding and gives notice of its intent
13 to participate as a full party.

14 In support of this petition, TRACER states as follows:

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

16 TRACER Oregon
17 1331 NW Lovejoy Street, Suite 900
18 Portland, OR 97209-3280
19 Phone: 206-623-4711
e-mail: aab@aterwynne.com

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

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

1 Brenda S. Molner
2 Ater Wynne LLP
3 601 Union Street, Suite 1501
4 Seattle, WA 98101-3981
5 bsm@aterwynne.com
6 Phone: 206.623.4711
7 Fax: 206.467.8406

8 3. TRACER is a coalition consisting of four (4) members which represents the
9 interests of large users of telecommunications services in the State of Oregon.

10 4. TRACER members are large end user customers of telecommunications
11 companies in Oregon. As end user customers of telecommunications services, TRACER
12 members have a direct interest in ensuring (a) that the prices charged by CenturyTel/United for
13 telecommunications services provided to business customers are fair, just, and reasonable; (b) if
14 a price plan should be adopted for the CenturyTel/United companies, whether the prices
15 charged for telecommunications services provided to business customers should be subject to
16 price caps; and (c) if no price caps will apply to business services, what other terms and
17 conditions of the price plan should be included to protect business customers from rate shock or
18 unfair, unjust, and unreasonable price increases.

19 5. As a representative of large end users, TRACER has knowledge and expertise that
20 will assist the Commission and the parties in resolving the issues presented in this proceeding.

21 6. The participation of TRACER in this proceeding will not unduly broaden the
22 issues or burden the record. And, no party will be prejudiced by granting TRACER's petition
23 to intervene at this time.

24 6. Please add the following TRACER representative to the service list in this docket:

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


Fax: 206.467.8406

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2 Based on the information provided above in accordance with the Commission's rules of
3 procedure, we request to participate in this proceeding as an intervenor. I or the organization
4 that I represent will not unreasonably broaden the issues, burden the record, or unreasonably
5 delay the proceeding. OAR 860-001-0300.

6 RESPECTFULLY SUBMITTED this 31st day of July, 2014.

7 ATER WYNNE LLP

8 By:


9 Arthur A. Butler WSBA #: 04678 (*pro hac vice*)
10 Brenda S. Molner OSB # 040352
11 601 Union Street, Suite 1501
12 Seattle, WA 98101-3981
13 Telephone: (206) 623-4711
14 Facsimile: (206) 467-8406
15 E-mail: aab@aterwynne.com
16 Attorneys for TRACER
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CERTIFICATE OF SERVICE

I hereby certify that I have this 31st day of July, 2014, served the foregoing along with the correct number of copies, of the foregoing PETITION TO INTERVENE & WAIVER OF PAPER SERVICE OF TELECOMMUNICATIONS RATEPAYERS ASSOCIATION FOR COST-BASED AND EQUITABLE RATES in docket UM 1686 upon each party listed in the UM 1686 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 at:

Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148
puc.filing_center@state.or.us

OPUC DOCKETS
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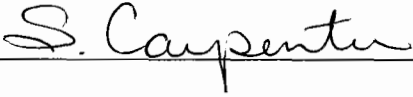
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RON L TRULLINGER
CENTURYLINK
310 SW PARK AVE 11TH FL
PORTLAND OR 97205

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

4 DATED this 31st day of July, 2014, at Seattle, Washington

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