

1                   **BEFORE THE PUBLIC UTILITY COMMISSION**  
2                                   **OF OREGON**

3                                   NC 356

4 PUBLIC UTILITY COMMISSION OF  
5 OREGON,

6                   Complainant,

7 v.

8 CENTURLINK COMMUNICATIONS,  
9 LLC,

9                   Defendant.

STAFF'S RESPONSE IN SUPPORT  
OF DEFENDANT'S MOTION

10  
11                   Staff for the Public Utility Commission of Oregon (Staff), by and through its undersigned  
12 counsel, hereby responds to Defendant's Application for Reconsideration or in the Alternative  
13 Motion to Modify Order. As stated in Defendant's filing, Staff supports the relief requested.

14                   Prior to issuance of Order No. 16-478 in this docket, the parties had reached agreement in  
15 principal on the terms of a stipulation that resolves the issues in the Complaint. Defendant has  
16 advised Staff that circumstances beyond the Company's control prevented it from timely  
17 executing the stipulation before Order No. 16-478 was issued.

18                   Regardless, under the terms of the stipulation, which was filed with Defendant's  
19 application, Defendant waives all rights to further hearing or appeal on the matters alleged in the  
20 complaint, agrees to a finding that the violation occurred and the full amount of the civil  
21 penalties (\$5,000). Future compliance with the applicable statutes and rules is better assured  
22 through the stipulation as it provides for a one-year period of probation and suspends a portion of  
23 the civil penalties (\$4,000), to be waived if Defendant commits no further violations during the  
24 probationary period.

25 ///

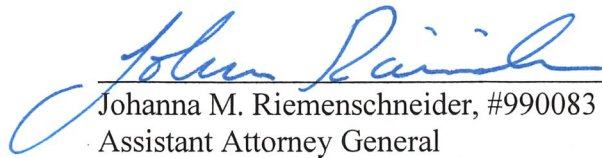
26 ///

1 For the foregoing reasons, Staff supports Defendant's filing and the requested relief that  
2 the Commission rescind Order No. 16-478 and adopt the stipulation executed by the parties.

3 DATED this 24<sup>th</sup> day of February 2017.

4 Respectfully submitted,

5 ELLEN F. ROSENBLUM  
6 Attorney General

7  
8   
9 Johanna M. Riemenschneider, #990083  
10 Assistant Attorney General  
11 Of Attorneys for Staff of the Public Utility  
12 Commission of Oregon  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26