

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1828

Served electronically at Salem, Oregon, 4/21/17 to:

Respondent

J & N. Cable Systems, Inc.
John Kusky, Registered Agent
614 S. Columbus Avenue
Goldendale, WA 98620

Complainant's Attorney

Richard G. Lorenz
Cable Huston LLP
rlorenz@cablehuston.com

Respondent's Attorney

Roger W. Bailey
Attorney at Law
roger.bailey.attorney@gmail.com

Re: UM 1828, Clatskanie People's Utility District, Complainant
vs. J & N Cable Systems, Inc., Respondent.

Clatskanie People's Utility District has filed a complaint against J & N Cable Systems, Inc. seeking authorization to remove pole attachments. A copy of the complaint is attached and served on Respondent under ORS 756.512. The Commission has assigned Docket No. UM 1828 to this complaint. Please use this number whenever you refer to this case.

Respondent has until May 22, 2017, to file its Answer under OAR 860-028-0070(7). After the filing of the answer, the matter will be set for hearing and you will be notified of the time and place. Please refer to our rules in effect prior to filing your answer. I have included a link for your convenience at http://arcweb.sos.state.or.us/pages/rules/oars_800/oar_860/860_tofc.html Other useful information can be located on the Commission's website at <http://www.puc.state.or.us> , specifically under the Hearings Division and Filing Center sections.

PUBLIC UTILITY COMMISSION OF OREGON



Annette Scott
Legal Secretary
Administrative Hearings Division
(503) 378-6678

Attachments: Complaint
Notice of Contested Case Rights and Procedures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM-_____

In the Matter of)	
)	PETITION FOR REMOVAL OF
CLATSKANIE PEOPLE'S UTILITY)	OCCUPANT POLE ATTACHMENTS
DISTRICT)	
)	
Authorization to Remove Pole)	
Attachments.)	

Pursuant to OAR § 860-028-0180(1), Clatskanie People's Utility District ("CPUD") hereby petitions the Public Utility Commission of Oregon ("Commission") for an order authorizing CPUD to remove from its utility poles any and all attachments made by J&N Cable Systems ("J&N"). As explained in more detail below, J&N has violated one or more duties of pole occupants set forth in OAR 860-028-0120. J&N has failed to remedy or cure such violations for more than 180 days. CPUD understands that J&N is no longer commercially active and has essentially abandoned its attachments on CPUD's poles. CPUD has provided J&N written notice of its intent to remove and dispose of J&N's attachments, to which J&N has expressed no objections. CPUD now seeks authorization to remove and dispose of such attachments in order to mitigate any potential safety hazards and to reclaim the usable space on its poles.

OAR § 860-028-0180 allows the Commission to authorize pole owners to remove a pole occupant's attachments when the pole occupant has failed to comply with certain legal obligations for more than 180 days. OAR § 860-028-0180(1) reads as follows:

If the pole occupant fails to meet the time limitations set out in OARs 860-028-0120, 860-028-0130, 860-028-0140, or 860-028-0150 by 180 or more days, then the pole owner may request an order from the Commission

authorizing removal of the pole occupant's attachments. Nothing in this section precludes a party from pursuing other legal remedies.

The test for authorizing removal of a pole occupant's attachments is two-fold: (1) has the pole occupant failed to meet a time limit established by the Commission's pole attachment rules; and (2) has such failure lasted for 180 days? As explained below, both parts of the test are satisfied in this case.

On April 25, 2016, CPUD notified J&N in writing that J&N was in violation of its legal duties as a pole occupant. First, J&N was in arrears on its annual pole attachment rentals for both 2013 and 2014 in the amount of \$15,099.68. Second, CPUD notified J&N that several of its attachments were in violation of applicable Commission safety standards. CPUD informed J&N that, pursuant to OAR 860-028-0120(5), J&N was required to submit a plan of correction with respect to each of its outstanding safety violations within 180 days. A copy of this April 25, 2016 correspondence is attached hereto as Exhibit A.

J&N responded to CPUD in writing on May 4, 2016, explaining that J&N was "in the process of closing the Rainier cable television system." J&N further indicated that, rather than correct its safety violations, it intended to remove its facilities from CPUD's poles altogether. Although J&N promised to "make arrangements to pay what we own on the poles," it also stated that "[i]t is very expensive removing our cable plant and we cannot afford to remove the cable plant **and** make payments." (Emphasis in original). CPUD responded in writing on May 27, 2016 providing additional technical information to J&N to facilitate removal of its cable plant, and explaining that the amount then due and owing had increased to \$23,398.32. Ultimately, J&N neither made any payments nor removed its cable plant. A copy of J&N's May 4, 2016 correspondence is attached

Page 2 - PETITION FOR REMOVAL OF OCCUPANT POLE ATTACHMENTS

hereto as Exhibit B. A copy of CPUD's May 27, 2016 correspondence is attached hereto as Exhibit C.

CPUD has not had any direct contact with J&N since May of 2016. CPUD was subsequently notified through a form letter from J&N's legal counsel dated July 29, 2016 that J&N was shutting down its operations and would not be paying any of its unsecured debts. The letter states that "J&N simply wasn't able to restructure its operations in a way that would be profitable in the long run. As a result, J&N has made the difficult decision to shut down its operations effective August 1, 2016." The letter further states that "there will not be any funds or assets available to pay creditors with general unsecured claims against J&N. J&N regrets that it is unable to make any payments to creditors." The letter does not address the removal of J&N's cable plant from CPUD's poles. A copy of this July 29, 2016 correspondence is attached hereto as Exhibit D.

CPUD has notified J&N in writing of CPUD's intent to remove and dispose of J&N's attachments, to which J&N has expressed no objection. By letter dated January 18, 2017, CPUD reminded J&N that it had unpaid pole attachment rental invoices and that it had safety violations that remained uncorrected. CPUD specifically stated that "in light of J&N Cable's failure to address safety violations and pay amounts due and owing within the time allowed under Oregon law, Clatskanie PUD intends to remove J&N Cable's facilities from Clatskanie PUD poles." CPUD gave J&N ten (10) business days in which to raise any objection that it may have to CPUD's removal and disposal of J&N's attachments and related facilities. Again, J&N has not expressed any objection to CPUD's removal and disposal of J&N's facilities that were left on CPUD's poles.

It is now reasonable and prudent for CPUD to remove J&N's abandoned facilities from CPUD poles. First, as noted above, certain of J&N's attachments have uncorrected code violations. Although CPUD is not aware of any imminent threat to public safety or property, it is now abundantly clear that these violations will not be corrected by J&N. It is in the public interest, therefore, to remove these attachments altogether. Second, because J&N is not actively maintaining any of its other attachments, it is reasonable to conclude leaving such attachments on CPUD's poles will result in further uncorrected code violations and possible safety hazards in the future. Finally, J&N's attachments are currently occupying usable space on CPUD's poles—without paying any compensation to CPUD—that could be used by other telecommunications providers or by CPUD itself.

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For the forgoing reasons, CPUD respectfully requests that the Commission issue an order pursuant to OAR § 860-028-0180(1) authorizing CPUD to remove from its poles, and to properly dispose of, any and all of J&N's attachments and related facilities. Such order is warranted under OAR § 860-028-0180(1) because J&N has failed to meet the time limit established in OAR 860-028-0120(5) to submit a plan of correction for outstanding safety code violations. J&N has failed to meet this time limit for 180 days. Further, such Commission order would be reasonable and prudent under the circumstances to allow CPUD to cleanup and reclaim usable space on its poles and because J&N has expressed no objection to CPUD's removal and disposal of J&N's abandoned attachments.

DATED this 21ST day of April, 2017.

/s/ Richard G. Lorenz

Richard G. Lorenz, OSB No. 003086

Cable Huston LLP

1001 SW Fifth Avenue, Suite 2000

Portland, OR 97204-1136

(503) 224-3092 (Telephone)

(503) 224-3176 (Fax)

rlorenz@cablehuston.com

Of Attorneys

Clatskanie People's Utility District

EXHIBIT A



Board of Directors
Don Hooper
Bob Wiggins
Merle Gillespie
Stephen D. Petersen
Linda A. Hooper

General Manager
W. Marc Farmer

April 25, 2016

J&N Cable Systems
Atten: Mr. Kusky
614 South Columbus
Goldendale, WA 98620

Dear Mr. Kusky:

Our records indicate that J&N Cable Systems ("J&N") owes the Clatskanie PUD (CPUD) \$15,099.68 for pole attachment rentals related to the years 2013 and 2014. In response to our September 15, 2015 request for payment, you stated on September 29, 2015 that you were working to come up with a plan to pay J&N's outstanding debt. Since then, we have received only one payment in the amount of \$500.

This is J&N's final notice to pay the entire amount due and owing within 30 days from the date of this letter. If CPUD does not receive payment in full in the time provided, then CPUD will pursue all available legal remedies to collect the outstanding debt along with interest and fees.

Additionally, J&N currently has over 100 outstanding attachment transfer requests on CPUD poles. Attached is a listing of transfer requests from the NJINS system. Several of these are PUC violations. Pursuant to OAR 860-028-0120(5) J&N is required to submit to CPUD an acceptable plan of correction for each of these violations within 60 calendar days of the date of this letter or to correct the violations within 180 calendar days. If J&N fails to correct these violations within this time, CPUD will have no choice but to impose sanctions against J&N as allowed under OAR 860-028-0120(a) and OAR 860-028-0150(2). Please also note that if J&N fails to correct these violations within the time allowed, CPUD also reserves the right to correct them itself at J&N's sole cost and expense pursuant to OAR 860-028-0120(5)(b).

Unless and until each of these matters are fully resolved, CPUD will no longer be able to process any new permit requests or allow any new attachments by J&N. Further, unless these matters are resolved in a timely fashion, CPUD is prepared request an order from the Oregon Public Utility Commission authorizing removal of all of your attachments pursuant to OAR 860-028-0180(1).

CPUD hopes that these actions will not be necessary and anticipate hearing from you shortly.

Sincerely,

A handwritten signature in black ink that reads "W. Marc Farmer". The signature is written in a cursive, flowing style.

W. Marc Farmer
attachment

EXHIBIT B

J & N Cable Systems, Inc.
614 S Columbus Avenue
Goldendale, WA 98620
509-773-5359

May 4, 2016

W. Marc Farmer
General Manager
Clatskanie PUD
PO Box 216
Clatskanie, OR 97016

Dear Mr. Farmer:

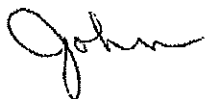
I would like to take this opportunity to inform you we are in the process of closing the Rainier cable television system. We would be taking down cable right now but had two road projects that set our time table back. It was our intention to have closed the system late last year. Unfortunately on June 10th I broke my leg and that set our plans back. As a tiny mom and pop company, we don't have the manpower resources so we had to delay closing of the system.

We could remove the cable from your poles if we had a clue where all of your poles are located. You sent a listing of the pole transfer requests but we need to have a complete listing of the poles we are on with their locations. If you have a map showing those areas that would be extremely helpful. It is our plan to start in the Alston Mayger Road area and work our way into Rainier. Then we would start in one of the other remote areas and work in towards town.

When we have completed the removal of all the cable from the poles we will make arrangements to pay what we owe on the poles. It is very expensive removing our cable plant and we cannot afford to remove the cable and make payments.

We look forward to working together to resolve this situation.

Sincerely yours,



John Kusky
President

EXHIBIT C



May 27, 2016

Dear Mr. Kusky,

I received your response letter dated May 4th, 2016. You indicate that you are closing down the system and requested the location of our poles. You also stated that you will make arrangements to pay what you owe, but cannot remove cable and pay at the same time. I will address both issues at this time.

As to requesting the location of our poles, you were sent a spreadsheet with the location in August of 2013. You also have, as we do, access to all the information on the pole attachment coordination program NJUNS. However, in an effort to expedite the process, we will have our staff update the spreadsheet. It is attached to this letter.

As for the payment arrangements, we have made payment arrangements with you before which have not been honored, resulting in even greater amounts of past due balances on your account. Waiting until after you remove the cable simply removes any incentive on your part to pay the remaining balance. As primary steward of the financials of this organization, I cannot in good faith based on prior performance and the large amount due to the District, allow for the type of arrangement you are proposing. To date you owe this District a total of \$23,398.32, which does not include the first five months of 2016. Unless payment arrangements are made in person and a substantial amount paid down on this balance (\$3,432.64), we will be forced to send the last two years past due balance of \$15,099.68 to collections. If your cable is not removed from our poles by 10-1-2016, upon permission from OPUC, we will remove the remainder of your services from our poles and bill you for our costs to do so. We will also turn the full amount owed plus the cost of removal over to collections.

While I can respect the fact that you are a mom and pop company, this does not preclude you from paying your bills just like the rest of our customers. The money that you owe belongs to all of our customers and comes out of their pockets if you do not pay. It is our fiduciary responsibility to collect all outstanding balances from our customers to maintain financial stability of the District, keep costs down as much as possible, and to make sure the rates we charge are fair to all. Costs and therefore rates increase if we do not fulfill our responsibilities. As I stated before, we have made arrangements with you in the past that have gone unpaid. This will be the last time arrangements will be offered. Please come in and see us by July 1, 2016 or we will file with the OPUC to remove all services from our poles and send the balance owed to collections.

Respectfully,

A handwritten signature in black ink that reads 'W. Marc Farmer'. The signature is written in a cursive style with a large, sweeping flourish at the end.

W. Marc Farmer
General Manager

EXHIBIT C

CLATSKANIE PUD
Owned by the People We Serve
CLATSKANIE PEOPLE'S UTILITY DISTRICT
 495 E Columbia River Hwy • P.O. Box 216 • Clatskanie, Oregon 97016

STATEMENT: 0
 Statement Date: 05/26/2016

J&N CABLE SYSTEMS INC
 614 S COLUMBUS
 GOLDENDALE WA 98620

Total Due:	23,398.32
Current Due:	0.00
1 - 29 Past Due:	8,298.64
30 - 59 Past Due:	0.00
60 - 89 Past Due:	0.00
90 & Over Past Due:	15,099.68

Account: 110

Page 1 of 1

Date	Invoice	Description	Amount	Balance	Amount
01/25/2016	25	4/23/14 Pole Contact Rental	6,865.28		6,865.28
01/25/2016	26	7/6/15 Pole Contact Rental	8,234.40		8,234.40
04/20/2016	79	Pole Contact Rental Billing	8,298.64		8,298.64
			Total Due:		23,398.32
Messages					
90 day past due					
RETAIN TOP PORTION FOR YOUR RECORDS AND RETURN BOTTOM PORTION WITH YOUR PAYMENT.					

CLATSKANIE PUD
Owned by the People We Serve
CLATSKANIE PEOPLE'S UTILITY DISTRICT
 495 E Columbia River Hwy • P.O. Box 216 • Clatskanie, Oregon 97016

Statement Date: 05/26/2016	Total Due:	23,398.32
Statement: 0	Amount	<input type="text"/>
Account: 110	Enclosed:	<input type="text"/>

J&N CABLE SYSTEMS INC
 614 S COLUMBUS
 GOLDENDALE WA 98620

Remit To:
 CLATSKANIE PEOPLE'S UTILITY DISTRICT
 PO BOX 216
 CLATSKANIE OR 97016

Pole Owner	Next to Ge	Ticket #	Pole #	Days Pending	Required by date	Job Type	County	City	Street
CPUD	JNCOR	929463	CPUD F29-A16	2127	7/12/2010	TRANSFER	Columbia	Rainier	NEAR 29770 OLD RAINIER ROAD
CPUD	JNCOR	1326443	B25 & BD1 TO BD26	666	8/10/2014	TRANSFER	Columbia	Rainier	(blank) MOSIER ROAD
CPUD	JNCOR	1326452	B25 & BD1 TO BD26	666	8/10/2014	TRANSFER	Columbia	Rainier	(blank) MOSIER ROAD
CPUD	JNCOR	1326468	B25 & BD1 TO BD26	708	6/29/2014	TRANSFER	Columbia	Rainier	(blank) MOSIER ROAD
CPUD	JNCOR	1326532	BAA4-L2 TO L3	1332	9/14/2012	DN	Columbia	Rainier	75740 PRICE ROAD
CPUD	JNCOR	1326549	BF3.5	1332	9/14/2012	TRANSFER	Columbia	Rainier	(blank) WARREN ROAD
CPUD	JNCOR	1329759	BA17 to BA22	607	10/8/2014	TRANSFER	Columbia	Rainier	25011 to 25223 ALSTON ROAD
CPUD	JNCOR	1448046	G4-R3	794	4/4/2014	TRANSFER	Columbia	Rainier	612 EAST D STREET
CPUD	JNCOR	1448049	G4-R3-SP1	794	4/4/2014	TRANSFER	Columbia	Rainier	612 EAST D STREET
CPUD	JNCOR	1448061	G4-R4	794	4/4/2014	TRANSFER	Columbia	Rainier	626 EAST D STREET
CPUD	JNCOR	1448080	F29-A24	792	4/6/2014	TRANSFER	Columbia	Rainier	29515 OLD RAINIER ROAD
CPUD	JNCOR	1448086	F29-A25-SP1	792	4/6/2014	TRANSFER	Columbia	Rainier	(blank) OLD RAINIER ROAD
CPUD	JNCOR	1449152	G4-R2	1118	4/25/2013	TRANSFER	Columbia	Rainier	(blank) EAST D STREET & 6TH
CPUD	JNCOR	1449214	G4-R1	1118	4/25/2013	TRANSFER	Columbia	Rainier	511 EAST D STREET
CPUD	JNCOR	1449241	G2/F5-R2	778	3/31/2014	TRANSFER	Columbia	Rainier	(blank) EAST E & EAST 5TH
CPUD	JNCOR	1449252	F5-L2-R6	778	3/31/2014	TRANSFER	Columbia	Rainier	(blank) 1ST & D STREET
CPUD	JNCOR	1449255	F15-L1	778	3/31/2014	TRANSFER	Columbia	Rainier	(blank) 1ST AND C STREET
CPUD	JNCOR	1449415	F5-L2-R6-L1	794	4/4/2014	TRANSFER	Columbia	Rainier	(blank) WEST 1ST STREET
CPUD	JNCOR	1453225	F29-A25	792	4/6/2014	TRANSFER	Columbia	Rainier	(blank) OLD RAINIER ROAD
CPUD	JNCOR	1456021	BC12	1108	5/25/2013	TRANSFER	Columbia	Clatskanie	23408 BEAVER FALLS RD
CPUD	JNCOR	1456066	BAA7	1108	5/25/2013	TRANSFER	Columbia	Rainier	75566 HOMEAWAY RD
CPUD	JNCOR	1456069	BAA5	1108	5/25/2013	TRANSFER	Columbia	Rainier	75735 PRICE ROAD
CPUD	JNCOR	1456071	BE2	1108	5/25/2013	TRANSFER	Columbia	Clatskanie	23931 SHEPARD ROAD
CPUD	JNCOR	1456076	BD25	1108	5/25/2013	TRANSFER	Columbia	Rainier	25209 MOSIER ROAD
CPUD	JNCOR	1456081	BD23	1108	5/25/2013	TRANSFER	Columbia	Rainier	25164 MOSIER ROAD
CPUD	JNCOR	1456082	BD22	1108	5/25/2013	TRANSFER	Columbia	Rainier	25086 MOSIER ROAD
CPUD	JNCOR	1456086	BF16	1108	5/25/2013	TRANSFER	Columbia	Rainier	24853 MOSIER ROAD
CPUD	JNCOR	1456088	BA-39-R10	1108	5/25/2013	TRANSFER	Columbia	Rainier	76880 HEATH ROAD
CPUD	JNCOR	1456089	BA-39-R9	1108	5/25/2013	TRANSFER	Columbia	Rainier	76881 HEATH ROAD
CPUD	JNCOR	1456090	BA-39-R7	1108	5/25/2013	TRANSFER	Columbia	Rainier	76895 HEATH ROAD
CPUD	JNCOR	1456091	BA39-R6	1108	5/25/2013	TRANSFER	Columbia	Rainier	76930 HEATH ROAD
CPUD	JNCOR	1456095	BA39-R5	1108	5/25/2013	TRANSFER	Columbia	Rainier	76937 HEATH ROAD
CPUD	JNCOR	1456098	BA40-R3-A4	1108	5/25/2013	TRANSFER	Columbia	Rainier	77128 SCOTT ROAD
CPUD	JNCOR	1456104	BF-35	1108	5/25/2013	TRANSFER	Columbia	Rainier	24275 WARREN ROAD
CPUD	JNCOR	1456110	BA39-R4	1108	5/25/2013	TRANSFER	Columbia	Rainier	76951 HEATH ROAD
CPUD	JNCOR	1458514	BA39-R1	1103	5/30/2013	TRANSFER	Columbia	Rainier	76770 SCOTT ROAD
CPUD	JNCOR	1458517	BA-40	1103	5/30/2013	TRANSFER	Columbia	Rainier	76785 ALSTON MAYGER ROAD
CPUD	JNCOR	1458523	BA-39	1103	5/30/2013	TRANSFER	Columbia	Rainier	(blank) SCOTT/ALSTON MAYGER ROAD
CPUD	JNCOR	1458531	BA-38	1103	5/30/2013	TRANSFER	Columbia	Rainier	76724 ALSTON MAYGER ROAD
CPUD	JNCOR	1458535	BA-37	1103	5/30/2013	TRANSFER	Columbia	Rainier	76626 ALSTON MAYGER ROAD
CPUD	JNCOR	1458537	BA-36	1103	5/30/2013	TRANSFER	Columbia	Rainier	76626 ALSTON MAYGER ROAD
CPUD	JNCOR	1458540	BA-35	1103	5/30/2013	TRANSFER	Columbia	Rainier	76626 ALSTON MAYGER ROAD
CPUD	JNCOR	1458544	BA-33	1103	5/30/2013	TRANSFER	Columbia	Rainier	76626 ALSTON MAYGER/TURNER ROAD

EXHIBIT C

CPUD	JNCOR	1458556 BA-34	1103	5/30/2013 TRANSFER	Columbia	Rainier	(blank)	ALSTON MAYGER/TURNER ROAD
CPUD	JNCOR	1458559 BA-32	1103	5/30/2013 TRANSFER	Columbia	Rainier	76439	ALSTON MAYGER ROAD
CPUD	JNCOR	1458561 BA-31	1103	5/30/2013 TRANSFER	Columbia	Rainier	76439	ALSTON MAYGER ROAD
CPUD	JNCOR	1458563 BA-29	1103	5/30/2013 TRANSFER	Columbia	Rainier	76387	ALSTON MAYGER ROAD
CPUD	JNCOR	1458567 BA-28	1103	5/30/2013 TRANSFER	Columbia	Rainier	76292	ALSTON MAYGER ROAD
CPUD	JNCOR	1458570 BA-27	1103	5/30/2013 TRANSFER	Columbia	Rainier	76292	ALSTON MAYGER ROAD
CPUD	JNCOR	1458579 BA-26	1103	5/30/2013 TRANSFER	Columbia	Rainier	76181	ALSTON MAYGER ROAD
CPUD	JNCOR	1458585 BA-25	1103	5/30/2013 TRANSFER	Columbia	Rainier	76181	ALSTON MAYGER ROAD
CPUD	JNCOR	1458588 BA-24	1103	5/30/2013 TRANSFER	Columbia	Rainier	76139	ALSTON MAYGER ROAD
CPUD	JNCOR	1458642 BA-23	1103	5/30/2013 TRANSFER	Columbia	Rainier	(blank)	ALSTON/ALSTON MAYGER ROAD
CPUD	JNCOR	1458653 BA84	1103	5/30/2013 TRANSFER	Columbia	Rainier	25405	WONDERLY ROAD
CPUD	JNCOR	1458656 BA-B3	1103	5/30/2013 TRANSFER	Columbia	Rainier	25331	WONDERLY ROAD
CPUD	JNCOR	1458661 BA21	1103	5/30/2013 TRANSFER	Columbia	Rainier	25239	ALSTON/ALSTON MAYGER RD
CPUD	JNCOR	1458662 BA22	1103	5/30/2013 TRANSFER	Columbia	Rainier	(blank)	ALSTON/ALSTON MAYGER RD
CPUD	JNCOR	1458664 BA20	1103	5/30/2013 TRANSFER	Columbia	Rainier	25220	ALSTON ROAD
CPUD	JNCOR	1458666 BA19	1103	5/30/2013 TRANSFER	Columbia	Rainier	25108	ALSTON ROAD
CPUD	JNCOR	1458672 BA18.1	1103	5/30/2013 TRANSFER	Columbia	Rainier	25108	ALSTON ROAD
CPUD	JNCOR	1458675 BA18	1103	5/30/2013 TRANSFER	Columbia	Rainier	25093	ALSTON ROAD
CPUD	JNCOR	1458691 BA17.1	1103	5/30/2013 TRANSFER	Columbia	Rainier	25036	ALSTON ROAD
CPUD	JNCOR	1458695 BA17	1103	5/30/2013 TRANSFER	Columbia	Rainier	24964	ALSTON ROAD
CPUD	JNCOR	1458711 B8	1059	7/13/2013 TRANSFER	Columbia	Rainier	23870	BEAVER FALLS/DELENA MAYGE
CPUD	JNCOR	1458713 BD4	1059	7/13/2013 TRANSFER	Columbia	Rainier	24163	MOSIER ROAD
CPUD	JNCOR	1458714 BD6	1059	7/13/2013 TRANSFER	Columbia	Rainier	24232	MOSIER ROAD
CPUD	JNCOR	1458716 BD7-SP1	1059	7/13/2013 TRANSFER	Columbia	Rainier	24258	MOSIER ROAD
CPUD	JNCOR	1458718 BD15-SP1	1054	7/18/2013 TRANSFER	Columbia	Rainier	242722	MOSIER ROAD
CPUD	JNCOR	1458722 BD18	1003	9/7/2013 TRANSFER	Columbia	Rainier	24818	MOSIER ROAD
CPUD	JNCOR	1458725 BD19	1055	7/17/2013 TRANSFER	Columbia	Rainier	24915	MOSIER ROAD
CPUD	JNCOR	1458728 BD21	1047	7/25/2013 TRANSFER	Columbia	Rainier	76656	MOSIER/ATKINS ROAD
CPUD	JNCOR	1458729 B24	1027	8/14/2013 TRANSFER	Columbia	Rainier	23997	DELENA MAYGER/KELLAR ROAD
CPUD	JNCOR	1458735 B40	1059	7/13/2013 TRANSFER	Columbia	Rainier	77292	DELENA MAYGER/REED ROAD
CPUD	JNCOR	1458739 BD3	1059	7/13/2013 TRANSFER	Columbia	Rainier	24025	MOSIER ROAD
CPUD	JNCOR	1464360 BD21-R6	778	4/20/2014 TRANSFER	Columbia	Rainier	76240	Atkins Road
CPUD	JNCOR	1464378 BD21-R1	778	4/20/2014 TRANSFER	Columbia	Rainier	25300	MOSIER ROAD
CPUD	JNCOR	1523507 F29-A11	1005	9/5/2013 TRANSFER	Columbia	Rainier	1210	WEST C STREET, RAINIER
CPUD	JNCOR	1525184 F29-A20	893	12/26/2013 MODIFY	Columbia	Rainier	29611	OLD RAINIER ROAD
CPUD	JNCOR	1525188 F29-A19	893	12/26/2013 MODIFY	Columbia	Rainier	29600	OLD RAINIER ROAD
CPUD	JNCOR	1525189 F29-A12-R5	893	12/26/2013 MODIFY	Columbia	Rainier	29656	FIR STREET
CPUD	JNCOR	1525486 F42-R3	893	12/26/2013 MODIFY	Columbia	Rainier	29787	RIVERVIEW DRIVE
CPUD	JNCOR	1554709 F29-A23-SP2	750	5/18/2014 TRANSFER	Columbia	Rainier	29518	OLD RAINIER ROAD
CPUD	JNCOR	1582292 F5L7	778	4/20/2014 TRANSFER	Columbia	Rainier	529	2nd Street East
CPUD	JNCOR	1711702 F9-R1 G6-L1	775	4/23/2014 TRANSFER	Columbia	Rainier	413	EAST C STREET
CPUD	JNCOR	1742350 B40-L5.1	736	6/1/2014 ATTACH	Columbia	Clatskanie	23881	Reed Road
CPUD	JNCOR	1752174 OFF OF F29-A10	79	3/19/2016 TRANSFER	Columbia	Rainier	1123	WEST C STREET
CPUD	JNCOR	1761608 BA39-R8-R3	711	6/26/2014 TRANSFER	Columbia	Rainier	TURNER RD	TURNER ROAD
CPUD	JNCOR	1761617 BA39-R8	711	6/26/2014 TRANSFER	Columbia	Rainier	(blank)	TURNER/HEATH INTERSECTION
CPUD	JNCOR	1875106 BF17.1	555	11/29/2014 ATTACH	Columbia	Clatskanie	24980 NEAR	WARREN ROAD

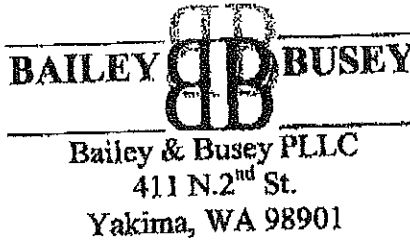
EXHIBIT C

CPUD	JNCOR	1875121 (NEW BF18)	555	11/29/2014 ATTACH	Columbia	Clatskanie	24980 NEAR	WARREN ROAD
CPUD	JNCOR	1875122 BF18 (OLD)	555	11/29/2014 TRANSFER	Columbia	Clatskanie	24980 NEAR	WARREN ROAD
CPUD	JNCOR	1921133 F29-A12-A5	485	2/7/2015 TRANSFER	Columbia	Rainier	29651	VIEW STREET
CPUD	JNCOR	1921165 F29-A12-A6	485	2/7/2015 TRANSFER	Columbia	Rainier	29607	VIEW STREET
CPUD	JNCOR	2355423 BA41	457	3/7/2015 TRANSFER	Columbia	Rainier	76758	ALSTON MAYGER ROAD
CPUD	JNCOR	2355424 BA42	457	3/7/2015 TRANSFER	Columbia	Rainier	76839	ALSTON MAYGER ROAD
CPUD	JNCOR	2355425 BA43	457	3/7/2015 TRANSFER	Columbia	Rainier	(blank)	ALSTON MAYGER ROAD
CPUD	JNCOR	2355426 BA45	457	3/7/2015 TRANSFER	Columbia	Rainier	76957	ALSTON MAYGER ROAD
CPUD	JNCOR	2355427 BA46	457	3/7/2015 TRANSFER	Columbia	Rainier	77061	ALSTON MAYGER ROAD
CPUD	JNCOR	2355428 BA47	457	3/7/2015 TRANSFER	Columbia	Rainier	77061	ALSTON MAYGER ROAD
CPUD	JNCOR	2608437 GB2-L2-R2-SP3	172	12/17/2015 TRANSFER	Columbia	Rainier	622	EAST A STREET
CPUD	JNCOR	2608456 GB2-L1	171	12/18/2015 TRANSFER	Columbia	Rainier	105	EAST 6TH STREET
CPUD	JNCOR	2608487 GB2-L2-L5	172	12/17/2015 TRANSFER	Columbia	Rainier	404	EAST A STREET
CPUD	JNCOR	2609017 341	171	12/18/2015 TRANSFER	Columbia	Rainier	5TH	EAST A STREET
CPUD	JNCOR	2609064 GB2	171	12/18/2015 TRANSFER	Columbia	Rainier	624	EAST B AND HWY 30
CPUD	JNCOR	2609220 GB2-L2-L1 OLD GB2-L2	171	12/18/2015 TRANSFER	Columbia	Rainier	105	EAST 6TH STREET

EXHIBIT D

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ROGER W. BAILEY
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July 29, 2016

Steve Roso, Manager
Vanguard Adjustment Company
P.O. Box 83168
Portland, OR 97288-0168

Dear Creditor of J&N Cable Systems, Inc.

Our office represents J&N Cable Systems, Inc. I am contacting you because J&N's books and records indicate that it may owe you money. J&N has been working diligently over the past year to attempt to restructure its operations in a way that would allow it to be competitive in today's cable/internet market. Unfortunately given the number of well financed competitors as well as the difficulty of obtaining financing, J&N simply wasn't able to restructure its operations in a way that would be profitable in the long run. As a result, J&N has made the difficult decision to shut down its operations effective August 1, 2016.

Substantially all of J&N's assets, including inventory and accounts receivable were pledged as collateral to its senior lender. It appears certain that J&N's senior lender will be left taking a few pennies on the dollar in repayment of its debt. This unfortunately means that there will not be any funds or assets available to pay creditors with general unsecured claims against J&N. J&N regrets that it is unable to make any payment to creditors.

If you have any questions or concerns about this matter please don't hesitate to call or e-mail me at your convenience.

Very Truly Yours,

Roger W. Bailey
RWB:rwb

NOTICE OF CONTESTED CASE RIGHTS AND PROCEDURES

Oregon law requires state agencies to provide parties written notice of contested case rights and procedures. Under ORS 183.413, you are entitled to be informed of the following:

Hearing: The time and place of any hearing held in these proceedings will be noticed separately. The Commission will hold the hearing under its general authority set forth in ORS 756.040 and use procedures set forth in ORS 756.518 through 756.610 and OAR Chapter 860, Division 001. Copies of these statutes and rules may be accessed via the Commission's website at www.puc.state.or.us. The Commission will hear issues as identified by the parties.

Right to Attorney: As a party to these proceedings, you may be represented by counsel. Should you desire counsel but cannot afford one, legal aid may be able to assist you; parties are ordinarily represented by counsel. The Commission Staff, if participating as a party in the case, will be represented by the Department of Justice. Generally, once a hearing has begun, you will not be allowed to postpone the hearing to obtain counsel.

Administrative Law Judge: The Commission has delegated the authority to preside over hearings to Administrative Law Judges (ALJs). The scope of an ALJ's authority is defined in OAR 860-001-0090. The ALJs make evidentiary and other procedural rulings, analyze the contested issues, and present legal and policy recommendations to the Commission.

Hearing Rights: You have the right to respond to all issues identified and present evidence and witnesses on those issues. *See* OAR 860-001-0450 through OAR 860-001-0490. You may obtain discovery from other parties through depositions, subpoenas, and data requests. *See* ORS 756.538 and 756.543; OAR 860-001-0500 through 860-001-0540.

Evidence: Evidence is generally admissible if it is of a type relied upon by reasonable persons in the conduct of their serious affairs. *See* OAR 860-001-0450. Objections to the admissibility of evidence must be made at the time the evidence is offered. Objections are generally made on grounds that the evidence is unreliable, irrelevant, repetitious, or because its probative value is outweighed by the danger of unfair prejudice, confusion of the issues, or undue delay. The order of presenting evidence is determined by the ALJ. The burden of presenting evidence to support an allegation rests with the person raising the allegation. Generally, once a hearing is completed, the ALJ will not allow the introduction of additional evidence without good cause.

Record: The hearing will be recorded, either by a court reporter or by audio digital recording, to preserve the testimony and other evidence presented. Parties may contact the court reporter about ordering a transcript or request, if available, a copy of the audio recording from the Commission for a fee set forth in OAR 860-001-0060. The hearing record will be made part of the evidentiary record that serves as the basis for the Commission's decision and, if necessary, the record on any judicial appeal.

Final Order and Appeal: After the hearing, the ALJ will prepare a draft order resolving all issues and present it to the Commission. The draft order is not open to party comment. The Commission will make the final decision in the case and may adopt, modify, or reject the ALJ's recommendation. If you disagree with the Commission's decision, you may request reconsideration of the final order within 60 days from the date of service of the order. *See* ORS 756.561 and OAR 860-001-0720. You may also file a petition for review with the Court of Appeals within 60 days from the date of service of the order. *See* ORS 756.610.