

Oregon Exchange Carrier Association

1104 Main Street, Suite 300 • Vancouver, WA • (360) 690-4537 • FAX (360) 690-4536
January 10, 2012

Filing Center
Oregon Public Utilities Commission
550 Capitol Street, NE
Salem, OR 97310-1380

RE: UM 1017 Request for Waiver

The purpose of this letter is to request an extension of the pool participation notice requirements contained in Part VII of the 2003 Oregon Customer Access Plan (OCAP). Part VII states "Any ILEC deciding not to participate for a future rate year shall notify the OPUC and OECA in writing of its decision by March 1 of the rate year in question."

The OUS per line support amounts for rural carriers are in the process of being updated for 2012. Until the final OUS per line support amounts are known, the OECA member companies would like to retain their options related to participation in the 2012 OECA pools. It is possible that revised OUS support levels will not be determined in time to be included in the OECA tariff filings anticipated to become effective on July 1, 2012. In this event, OECA will base their filings on the current per line support levels, and make subsequent filings as needed to reflect the revised support levels once they have been determined and approved by the Commission.

In addition, FCC Order No. 11-161 requires companies to reduce their intrastate terminating rates by one half of the amount that the intrastate terminating rates exceed the interstate terminating rates as of December 31, 2011. This calculation could have a material effect on intrastate originating access rates, and the OECA member companies request additional time to evaluate these results.

OECA hereby requests that the pool participation deadline in Part VII of the 2003 OCAP be extended until June 1, 2012 for the current year only. The March 1 notice deadline should remain in effect for future years.

Thank you for your consideration.

Sincerely,



Craig Phillips
Administrator

Cc: Roger White, OPUC Staff