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May 6, 2016

VIA E-MAIL

Filing Center Oregon Public Utility Commission PO Box 1088 Salem OR 97308-1088

Re: Oregon Telephone Corporation - Petition for Exemption Under ORS 759.040(4) and (5)

Dear Sir/Madam:

Attached for filing you will find the Petition for Exemption Under ORS 759.040(4) and (5) for Oregon Telephone corporation.

Thank you for your attention to this matter.

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RICHARD A. FINNIGAN

RAF/cs Enclosures

cc: Client (via e-mail)

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5	BEFORE THE PUBLIC UTILITY COMMISSION
6	OF OREGON
7	
8 9	
9 10	In the Matter of
10	PETITION FOR EXEMPTION PETITION FOR EXEMPTION
12	UNDER ORS 759.040(4) AND (5) BY OREGON TELEPHONE CORPORATION
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14	One The loss Comparison man at fully submits this Detition for Examption murguent
15	Oregon Telephone Corporation respectfully submits this Petition for Exemption pursuant to the authority set forth in ORS 759.040(4) and ORS 759.040(5).
16	Under ORS 759.040(4), a telecommunications utility serving fewer than fifty thousand
17	access lines in Oregon may be exempted from ORS 759.180 to ORS 759.190; ORS 759.375 to
18	ORS 759.393 and ORS 759.300 to ORS 759.360 if the Commission determines it to be in the
19	public interest to grant the exemption.
20	Under ORS 759.040(5), upon petition by a telecommunications utility serving fewer than
21	fifty thousand access lines in Oregon, the Commission may exempt such telecommunications
22	utility from ORS 759.175 and ORS 759.205 to ORS 759.215 if the Commission finds that it is in
23	the public interest to do so.
24 25	
26	
	PETITION FOR EXEMPTION - 1

Oregon Telephone Corporation operates approximately 1,560 working loops^{*} in the State of Oregon, which is clearly less than the fifty thousand access lines limitation in statute.

The Commission has exempted several rural telephone companies such as Oregon Telephone Corporation under petitions filed pursuant to ORS 759.040(4) and ORS 759.040(5) in the past. Oregon Telephone Corporation is not aware of any problems that have arisen or been created by such exemptions.

Providing exemptions to Oregon Telephone Corporation will allow it to have increased flexibility in dealing with its customers and to better serve its customers. On this basis, Oregon Telephone Corporation respectfully requests that the Commission find that it is in the public interest to grant the exemptions authorized by ORS 759.040(4) and ORS 759.040(5).

DATED: May 6, 2016.

RICHARD A. FINNIGAN, OSB No. 965357 Attorney for the Oregon Telephone Corporation

* Source - USAC Report HC-05, 2nd Quarter 2016. There are 200 working loops in the MTE study area and approximately 1,360 working loops in the Oregon Telephone study area.

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