



David Collier
Area Manager
Regulatory

645 E. Plumb Lane, Rm. C142
PO Box 11010
Reno, NV 89520

775-333-3986 Phone
775-333-2364 Fax
david.collier@att.com

October 5, 2012

Allan Arlow, Law Judge
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: AR 566 – Reply Comments of AT&T

Dear Judge Arlow:

Enclosed for filing in the above entitled matter, please find an original and three copies of AT&T's Reply Comments.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ _____

David Collier
Area Manager – Regulatory Relations

Attachment

cc: Service List plus original + 3 copies being sent via overnight mail

CERTIFICATE OF SERVICE
AR 566

I hereby certify that on the 5th day of October, 2012, I served the foregoing Petition to Intervene by AT&T in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at the address shown below, or via email only if the service list indicates such persons waive paper service.

<p>Ron L. Trullinger (W) Manager–Oregon Regulatory CenturyLink 310 SW Park Ave 11th Fl. Portland, OR 97205 ron.trullinger@centurylink.com</p>	<p>William E. Hendricks (W) Attorney CenturyLink, Inc. 902 Wasco St A0412 Hood River, OR 97031 tre.hendricks@centurylink.com</p>	<p>G. Catriona McCracken (W) Legal Counsel/Staff Atty Citizens’ Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 catriona@oregoncub.org</p>
<p>OPUC Dockets (W) Citizens’ Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 dockets@oregoncub.org</p>	<p>Johanna Riemenschneider (W) PUC Staff - DOJ Business Activities Section 1162 Court St. NE Salem, OR 97301-4796 johanna.riemenschneider@doj.state.or.us</p>	<p>Jason W Jones (W) PUC Staff - DOJ Business Activities Section 1162 Court St. NE Salem, OR 97301-4796 jason.w.jones@state.or.us</p>
<p>Brant Wolf (W) Executive Vice President Oregon Telecom. Assn 777 13th St SE – STE 120 Salem, OR 97301-4038 bwolf@ota-telecom.org</p>	<p>Craig Phillips (W) Oregon Exchange Carrier Assn 1104 Main St., #300 Vancouver, WA 98660 cphillips@oeca.com</p>	<p>Richard A. Finnigan (W) Attorney at Law Law Office of Richard A. Finnigan 2112 Black Lake Blvd SW Olympia, WA 98512 rickfinn@localaccess.com</p>
<p>Malia Brock (W) Public Utility Commission of OR PO Box 2148 Salem, OR 97308 malia.brock@state.or.us</p>	<p>Charles L. Best (W) 1631 NE Broadway #538 Portland, OR 97232-1425 chuck@charleslbest.com</p>	<p>Cynthia Manheim (W) PO Box 97061 Redmond, WA 98052 cindy.manheim@att.com</p>
<p>Michael Shortley (W) Level 3 Communications LLC 225 Kenneth Dr Rochester, NY 14623 michael.shortley@level3.com</p>	<p>Lisa F Rackner (W) McDowell Rackner & Gibson PC 419 SW 11th Ave., Suite 400 Portland, OR 97205 dockets@mcd-law.com</p>	<p>Michael Dewey (W) OCTA 1249 Commercial St SE Salem, OR 97302 mdewey@oregoncable.com</p>
<p>Richard B Severy (W) Verizon 2775 Mitchell Dr, Bldg. 8-2 Walnut Creek, CA 94598 richard.b.severy@verizon.com</p>	<p>Lorraine A Kocen (W) Verizon California Inc 2523 W Hillcrest Dr, 2nd Fl Newbury Park, CA 91320 lorraine.kocen@verizon.com</p>	<p>Rudolph M Reyes (W) Verizon Corporate Counsel 201 Spear Street 7th Floor San Francisco, CA 94105 rudym.reyes@verizon.com</p>

<p>Doug Cooley (W) Comcast Bus. Comm. LLC 1710 Salem Industrial Dr. NE Salem, OR 97303 doug_cooley@cable.comcast.com</p>	<p>Mark P. Trincherro (W) Davis Wright Tremaine LLP 1300 SW Fifth Ave Ste 2300 Portland, OR 97201-5682 marktrincherro@dwt.com</p>	<p>Phyllis Whitten (W) Frontier Communications 9260 E Stockton Blvd Elk Grove, CA 95624 phyllis.whitten@ftr.com</p>
<p>Renee Willer (W) Frontier Communications Northwest Inc. 20575 NW Von Neumann Dr Beaverton, OR 97006-6982 renee.willer@ftr.com</p>	<p>George Schreck (W) Integra Telecom 1201 NE Lloyd Blvd, STE 500 Portland, OR 97232 george.schreck@integratelecom.com</p>	<p>Douglas K Denney (W) Integra Telecom of Oregon Inc 1201 NE Lloyd Blvd, STE 500 Portland, OR 97232 dkdenney@integratelecom.com</p>
<p>Adam Lowney (W) McDowell Rackner & Gibson 419 SW 11th Ave, Ste. 400 Portland, OR 97205 adam@mcd-law.com</p>	<p>Lyndall Nipps (W) tw Telecom of Oregon LLC 9665 Granite Ridge Dr. – Ste. 500 San Diego, CA 92123 lyndall.nipps@twtelecom.com</p>	<p>Marc M Carlton (W) Williams, Kastner & Gibbs PLLC 888 SW Fifth Ave, Ste. 600 Portland, OR 97204-2025 mcarlton@williamskastner.com</p>
<p>Mary Retka (W) mary.retka@centurylink.com</p>	<p>Roberta Vandhey (W) Star Route Fossil, OR 97830 robertav2@yahoo.com</p>	<p>Sommer Templet (W) Citizens' Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 sommer@oregoncub.org</p>
<p>John T. Dillard (W) Monroe Telephone Co. PO Box 130 Monroe, OR 97456 jtdillard@monroetel.com</p>	<p>Novi Campbell (W) Pac-West Telecomm Inc. 4210 Coronado Ave. Stockton, CA 95204 ncampbell@pacwest.com</p>	<p>Jeff Crews (W) PriorityOne Telecommunications PO Box 1462 La Grande, OR 97850 jcrews@p1tel.com</p>
<p>Sharon Mullin (W) AT&T Services, Inc. 2003 Point Bluff Austin, TX 78746 smullin@att.com</p>	<p>Fred Goodwin (W) Public Utility Commission of OR PO Box 2148 Salem, OR 97308 fred.goodwin@state.or.us</p>	<p>Alan J. Galloway (W) Davis Wright Tremaine LLP 1300 SW Fifth Ave Ste 2300 Portland, OR 97201-5682 alangalloway@dwt.com</p>
<p>Gail Long (W) TDS Telecom Western Region PO Box 1566 Oregon City, OR 97045 gail.long@tdstelecom.com</p>	<p>Robin Smith (W) LS Networks 921 SW Washington St. Ste 370 Portland, OR 97205 rsmith@lsnetworks.net</p>	<p>Scott Warren (W) Rio Networks.com PO Box 1146 Roseburg, OR 97470 scott.w@rionetworks.com</p>
<p>Thomas J. Barth (W) Scio Mutual Telephone Assn. 38982 SE 2nd Ave Scio, OR 97374 tbarth@smt-net.com</p>		

(W) = Waive Paper Service

DATED this 5th day of October, 2012

AT&T

By: /s/ _____
David Collier
645 E. Plumb Lane, Rm C142
P.O. Box 11010
Reno, NV 89520
(775) 333-3986 (telephone)
(775) 333-2364 (facsimile)
david.collier@att.com



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Area Manager
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Sincerely,

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David Collier
Area Manager – Regulatory Relations

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 566

In the Matter of)
) **AT&T REPLY COMMENTS**
Amendments to OAR 860-032-0007 to)
Address Call Termination Issues)
)
)

AT&T Communications of the Pacific Northwest, Inc.¹ and TCG Joint Venture Holdings, Inc. d/b/a TCG Oregon (“AT&T”) respectfully submit these reply comments in accordance with the schedule set forth in the Notice of Proposed Rulemaking (“Notice”) as modified by the September 21, 2012 procedural ruling.

I. No Need For State-Specific Call Completion Rules as the Issue is Already Being Addressed Nationally

No one disputes that call completion, including to rural areas, is important. There is, however, a divergence of opinion on the magnitude of the issue and, if present, how it should be addressed. AT&T and a number of commenters assert that call completion issues require resolution on a national level and a state-specific rule is not advisable or necessary.²

¹ On September 11, 2012, a request was filed with the Commission to transfer the certificate of authority for competitive services from AT&T Communications of the Pacific Northwest, Inc. to AT&T Corp. with an effective date on or around October 31, 2012, Docket CP-1539.

² See Initial Comments of Verizon, page 2; tw telecom of Oregon llc, Level 3 Communications, LLC, and Sprint Communications Company, LP (“Joint Commenters”), pages 1-2, 4; Oregon Cable Telecommunications Association (“OCTA”), page 1; CenturyLink, page 1; Frontier, page 1.

As discussed by AT&T and others and acknowledged by the Oregon Telecommunications Association (“OTA”), the Federal Communications Commission (“FCC”) has issued two important decisions within the last year – the *ICC/USF Transformation Order*³ and a *Declaratory Ruling*⁴ to address call completion issues.⁵ Further, as noted by many, actions are being taken by ATIS and the FCC’s Rural Call Completion Taskforce to investigate and address call completion issues.⁶ Indeed, it appears that all of these efforts are already resulting in progress on the issue.⁷ Even OTA admits that there may have been some incremental progress in addressing call completion issues nationally.⁸ AT&T believes that these actions at the national level should be given time.

OTA submitted with its comments an ex parte filed on September 26, 2012, by NARUC with the FCC. This ex parte contains a resolution passed by NARUC in July 2012 which is instructive in two respects. First, the NARUC resolution discusses a test call project completed after the release of the FCC’s *Declaratory Ruling* which shows that “overall call termination and call quality problems did improve since NECA’s previous test call project conducted in September 2011.” Second, the NARUC Resolution calls on the FCC to “expeditiously identify providers that have not resolved practices that result in call termination issues” and to take

³ See *Connect America Fund*, WC Docket No. 10-90 et al, FCC 11-161, Report and Order and Further Notice of Proposed Rulemaking rel. Nov. 18, 2011)(“*ICC/USF Transformation Order*”).

⁴ See *Developing a Unified Intercarrier Compensation Regime, Establishing Just and Reasonable Rates for Local Exchange Carriers*, CC Docket No. 01-92, WC Docket No. 07-135, DA 12-124, Declaratory Ruling (re. February 6, 2012)(“*Declaratory Ruling*”).

⁵ See Initial Comments of Verizon, pages 5-7; Joint Commenters, pages 2-4; OCTA pages 1-2 and 5-6; CenturyLink, page 1.

⁶ See Verizon comments, page 3-5; OCTA, pages 6-7; Joint Commenters, pages 2-3; CenturyLink, page 1.

⁷ See Verizon comments, page 8.

⁸ OTA comments, page 1.

“appropriate and swift action” against those providers.⁹ The resolution recognizes that the best way to address call completion issues is through enforcement actions at the FCC.

OTA even acknowledges that the draft rules “may cause some entities that operate in multiple states concern, and perhaps, operating problems and expense.”¹⁰ This is exactly the problem with state-specific rules. If every state, or even just a few, were to adopt state-specific rules, carriers operating in multiple states may be required to adopt various reporting mechanisms. In the worst case, states may adopt conflicting rules making compliance for the carriers impossible. As staff has recognized, the incentive for avoiding terminating calls to rural areas will be eliminated when the intercarrier compensation reforms mandated by the FCC are fully in effect. As such, carriers should not be required to implement onerous rules that will only be needed for a few years.

There are a number of actions that the Commission should take to ameliorate call completion issues that do not require the adoption of onerous state-specific rules. As pointed out by Verizon, the Commission should support action by the FCC to enforce rules and policies set forth in its *Declaratory Ruling*. The Commission should also reduce the incentive for call completion issues by ensuring compliance with the *ICC/USF Transformation Order* by actively reviewing and monitoring access reductions, the first phase of which went into effect in July 2012.¹¹ In addition, the Oregon Commission should follow the FCC’s lead and pursue case-by-

⁹ NARUC July 2012 Resolution, page 2

¹⁰ See OTA comments, page 2

¹¹ See VZ comment, page 8

case enforcement of its existing authority.¹² The Oregon Commission should also encourage carriers to work together to quickly address any call completion issues that may arise.¹³

II. Comments on Specific Proposed Rule

For the reasons discussed in the preceding section, AT&T continues to believe that no state-specific call termination rule is necessary. Indeed, the majority of commenters agree with AT&T's position.¹⁴ Numerous commenters echo AT&T's concern that if any rule is adopted by the Commission, the rule must specifically focus on call completion, the stated purpose of this rulemaking.¹⁵

Alternate proposed rule language was included in many of the comments.¹⁶ The alternate proposed rule language was limited to Rule 16 and, in some cases, Rule 17, but did not include Rules 18 – 20, as the majority supported withdrawing those rules in their entirety.

A. Rule 16:

While AT&T continues to believe that no state-specific rule should be adopted, if the Commission nevertheless adopts a rule, it should be limited to a variation of Rule 16. Although various alternates to Rule 16 were proposed by commenters, the proposals are a vast improvement over the original proposed rule. However, an important concept is still missing from all of these proposals. The Commission does not have the authority to resolve issues or

¹² Joint Commenters, page 4; see Oregon Cable Telecommunications Association (OCTA) comments, pg 1 (“The Commission has sufficient existing authority to address call termination issues if or when they arise.”); CenturyLink Initial Comments, page 3.

¹³ Although there has been only anecdotal reference to a limited number of Oregon intrastate call termination issues, handling these issues on a carrier-to-carrier basis is the most efficient means to reach resolution.

¹⁴ See OCTA comments, page 1, Verizon, pages 2-3; CenturyLink, page 1; Joint Commenters, page 1; Frontier, page 1.

¹⁵ See Joint Commenters, page 5; CenturyLink, page 3.

¹⁶ See Joint Commenters, page 6; OCTA, page 14; OTA, page 3; Frontier, page 2; CenturyLink, pages 4-5.

issue penalties in connection with a call that originates in another state, or interstate traffic.¹⁷ As such, Rule 16 must be limited to intrastate traffic. AT&T believes that if any rule is adopted it should be limited to the following:

(16) Except to the extent authorized by law, the certificate holder shall not block, choke, reduce or restrict intrastate traffic to another certificate holder's service area in such a manner as to attempt to or to avoid paying terminating access charges. In determining whether there has been a violation of this standard, the Commission will consider the frequency with which the violations occur and the corrective action, if any, undertaken by the certificate holder and whether the certificate holder had knowledge of the violation. The Commission will not impose penalties in the event the certificate holder did not have knowledge of the violation or has taken reasonable corrective action. An aggrieved party is required to notify the certificate holder in writing of any issues and parties are encouraged to resolve any issues informally before seeking relief under this rule.

B. Rule 17:

OTA/Frontier/CenturyLink proposed a modified Rule 17. AT&T opposes adoption of any Rule 17 for a number of reasons. First, Rule 17 is not limited to call completion issues, the focus of this rulemaking. Second, AT&T agrees with the Joint Commenters who observe that proposed Rule 17 is unnecessary as Rule 16 already addresses all relevant forms of blocking and choking.¹⁸ Third, Rule 17 addresses call routing practices, an area the FCC purposefully avoided in its *Declaratory Ruling*. The Oregon Commission should likewise not interfere with call routing practices.¹⁹ Fourth, Rule 17 is vague as it uses undefined terms such as “lower service quality” and “higher service quality”. Last, there is no materiality threshold in the rule, so that a

¹⁷ See Verizon comments, page 9

¹⁸ See Joint Commenters, page 6

¹⁹ See Joint Commenters, page 9

statistically insignificant difference could result in a basis for a violation. Call completion rates between rural and non-rural areas may vary for a number of reasons that are not at all related to the difference in terminating access rates such as extended transport distances, use of tandems, and so forth.

C. Rules 18 – 20:

No argument can be made that proposed Rules 18 to 20 are specifically focused on call completion issues. As proposed Rules 18 to 20 are not specifically focused on call termination and no party is insisting on these rules, the Commission should exclude Rules 18-20 from further consideration.

AT&T continues to participate in discussions with other carriers on a proposed rule and is hopeful that a consensus can be reached across the entire telecommunications industry. AT&T believes it would be beneficial for staff to also engage in these discussions.

III. If Any is Adopted Rule it Must Include a Sunset Provision

As Verizon explained in its comments, “if the Commission proceeds to adopt any new regulations (which it should not), they should be subject to a ‘sunset’ provision.”²⁰ AT&T wholeheartedly supports sunset of any rules adopted by the Commission to address call completion issues. As Verizon explains, the FCC’s intercarrier compensation reforms will eliminate the difference between interstate and intrastate terminating switched access rates. As this will occur by July 1, 2013, AT&T believes that a two year sunset will allow sufficient time for this change in terminating access rates. At a minimum, Staff should be required to conduct a study to determine whether there continues to be any call completion issues that necessitate the continuance of a rule.

²⁰ See Verizon Comments, page 18

IV. Conclusion

Efforts are already being taken to address call termination issues nationally and it appears that these efforts are starting to reduce call termination issues to rural areas. The Commission, therefore, should not adopt state-specific call termination rules at this time. If the Commission nevertheless proceeds with a call termination rule, it should be limited to the modified rule 16 proposed herein and the rule should sunset within 2-years.

Dated this 5th day of October, 2012

By Cynthia Manheim *by Doc with permission*

Cynthia Manheim

AT&T

PO Box 97061

Redmond, WA 98073-9761

Tel: 425.580.8112

Fax: 425.580.8652

Email: cindy.manheim@att.com

Attorney for AT&T Communications of the Pacific Northwest, Inc. and TCG Joint Venture Holdings, Inc d/b/a TCG Oregon and its subsidiaries

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AR 566

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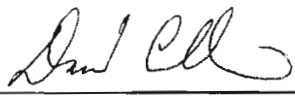
<p>Ron L. Trullinger (W) Manager–Oregon Regulatory CenturyLink 310 SW Park Ave 11th Fl. Portland, OR 97205 ron.trullinger@centurylink.com</p>	<p>William E. Hendricks (W) Attorney CenturyLink, Inc. 902 Wasco St A0412 Hood River, OR 97031 tre.hendricks@centurylink.com</p>	<p>G. Catriona McCracken (W) Legal Counsel/Staff Atty Citizens’ Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 catriona@oregoncub.org</p>
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<p>Doug Cooley (W) Comcast Bus. Comm. LLC 1710 Salem Industrial Dr. NE Salem, OR 97303 doug_cooley@cable.comcast.com</p>	<p>Mark P. Trincherro (W) Davis Wright Tremaine LLP 1300 SW Fifth Ave Ste 2300 Portland, OR 97201-5682 marktrincherro@dwt.com</p>	<p>Phyllis Whitten (W) Frontier Communications 9260 E Stockton Blvd Elk Grove, CA 95624 phyllis.whitten@ftr.com</p>
<p>Renee Willer (W) Frontier Communications Northwest Inc. 20575 NW Von Neumann Dr Beaverton, OR 97006-6982 renee.willer@ftr.com</p>	<p>George Schreck (W) Integra Telecom 1201 NE Lloyd Blvd, STE 500 Portland, OR 97232 george.schreck@integratelecom.com</p>	<p>Douglas K Denney (W) Integra Telecom of Oregon Inc 1201 NE Lloyd Blvd, STE 500 Portland, OR 97232 dkdenney@integratelecom.com</p>
<p>Adam Lowney (W) McDowell Rackner & Gibson 419 SW 11th Ave, Ste. 400 Portland, OR 97205 adam@mcd-law.com</p>	<p>Lyndall Nipps (W) tw Telecom of Oregon LLC 9665 Granite Ridge Dr. – Ste. 500 San Diego, CA 92123 lyndall.nipps@twtelecom.com</p>	<p>Marc M Carlton (W) Williams, Kastner & Gibbs PLLC 888 SW Fifth Ave, Ste. 600 Portland, OR 97204-2025 mcarlton@williamskastner.com</p>
<p>Mary Retka (W) mary.retka@centurylink.com</p>	<p>Roberta Vandhey (W) Star Route Fossil, OR 97830 robertav2@yahoo.com</p>	<p>Sommer Templet (W) Citizens' Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 sommer@oregoncub.org</p>
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645 E. Plumb Lane, Rm C142
P.O. Box 11010
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(775) 333-3986 (telephone)
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david.collier@att.com