

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, Washington 98512

Richard A. Finnigan
(360) 956-7001
rickfinn@localaccess.com

Candace Shofstall
Legal Assistant
(360) 753-7012
candaces@localaccess.com

April 26, 2018

VIA E-FILING

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

Re: DR 52 – Warm Springs Telecom Petition for a Declaratory Ruling

Dear Sir/Madam:

The purpose of this letter is to provide the Commission with the position of the Oregon Telecommunications Association (OTA) on the above referenced Petition for Declaratory Ruling (Petition). It is OTA's position that the Commission should not accept the Petition.

OTA takes this position for two reasons. First, all of OTA's members are treated exactly the same as Warm Springs with respect to Oregon Universal Service payments. Therefore, it would be inappropriate to grant a petition that would favor one party's accounting interpretation when all recipients of support of OUSF support are in exactly the same position. Obviously, the amounts vary by company depending upon the draw the company receives from the OUSF and line count trends, but this impacts every company.

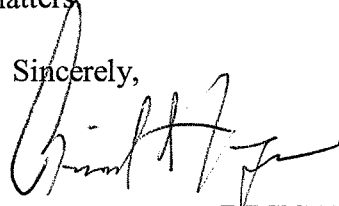
Second, OTA has reviewed the Warm Springs Petition and does not believe that it is factually supported as presented.

The Commission has absolute discretion as to whether to proceed on a Petition for Declaratory Ruling or not. In this instance, OTA requests that the Commission decline to open a declaratory ruling and not engage in further proceedings related to the Petition.

Oregon Public Utility Commission
April 26, 2018
Page 2 of 2

Thank you for your consideration in these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Finnigan". The signature is fluid and cursive, with a large initial "R" and "F".

RICHARD A. FINNIGAN

RAF/cs

cc: Client (via e-mail)
Laurel Anderson (via e-mail)
Johanna Riemenschneider (via e-mail)
Marsha Spellman (via e-mail)