

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1437

In the Matter of,
TRACFONE WIRELESS, INC.
Application for Designation as an Eligible
Telecommunications Carrier.

PETITION TO INTERVENE IN TRACPHONE
APPLICATION

Pursuant to OAR 860-012-0001(1), the Oregon Office of Emergency Management (“OEM”) petitions to intervene in this matter. In support of this petition, OEM provides the following information:

The name and address of the petitioner:

Oregon Emergency Management
State 9-1-1 Program
PO Box 14370
Salem, OR 97309

The name and address of the attorney or authorized representative of the petitioner:

Steven A. Wolf
Assistant Attorney General
Oregon Department of Justice
1162 Court Street NE
Salem, OR 97301-4096

///
///

1 The nature and extent of the petitioner's interest in the proceeding:

2 Petitioner is the state agency responsible under ORS chapter 403 for
3 administering and enforcing laws governing the establishment and
4 maintenance of the state's 9-1-1 emergency reporting systems, including the
5 fifty Public Safety Answering Points (PSAPs) or *9-1-1 Centers* in Oregon.

6 The issues petitioner intends to raise at the proceeding:

7 Petitioner will raise only those issues that are directly related to the filings
8 in this matter that affect or impact 9-1-1 emergency reporting systems and
9 PSAPs in Oregon.

10 Any special knowledge or expertise of the petitioner that would assist the Commission in
11 resolving the issues in the proceeding:

12 Petitioner and the PSAPs with which it works and on whose behalf it
13 seeks to appear are extremely familiar with issues regarding lifeline
14 services as they relate to 9-1-1.

15 DATED this 19th day of May 2010.

16 Respectfully submitted,

17 JOHN R. KROGER
18 Attorney General

19 

20 Steven A. Wolf, #86318
21 Attorney-in-Charge
22 Of Attorneys for Office of Emergency
23 Management Division, State of Oregon
steven.wolf@doj.state.or.us

CERTIFICATE OF SERVICE

I hereby certify that on the 17th of May 2010, I served a copy of the foregoing

PETITION TO INTERVENE by the method indicated below, and addressed to the following;

- HAND DELIVER
- OVERNIGHT MAIL
- U.S. MAIL
- TELECOPY (FAX)
- Electronic Mail

Gordon Feighner, Energy Analyst
Citizens Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205

Robert Jenks, Executive Director
Citizens Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205

G. Catriona McCracken, Legal Counsel
Citizens Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205

Raymond Myers, Attorney
Citizens Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205


Kevin Elliott Parks, Staff Attorney
Citizens Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205

Michel T. Weirich
Regulated Utility & Business Section
1162 Court Street NE
Salem, OR 97301-4096

Mitchell F. Brecher
Greenberg Traurig, LLP
2101 L Street NW, Suite 1000
Washington DC 20037

Debra McGuire Mercer
Greenberg Traurig, LLP
2101 L Street NW, Suite 1000
Washington DC 20037

Richard A. Finnigan
Attorney at Law
2112 Black Lake Blvd. SW
Olympia, WA 98512



Steven A. Wolf, OSB #86318
Assistant Attorney General
Government Services Section
steven.wolf@doj.state.or.us