

JOHN R. KROGER
Attorney General



MARY H. WILLIAM
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

August 19, 2011

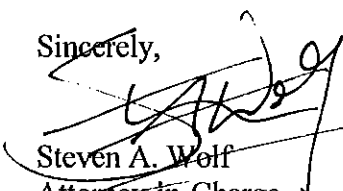
Public Utility Commission of Oregon
550 Capitol St NE, Suite 215
Salem, OR 97301

RE: In the Matter of Virgin Mobile USA LLC – UM 1522
DOJ File No. 248200-GG1122-11

Dear Sir or Madam:

Enclosed for filing on behalf of the Oregon Emergency Management is an Original and a copy of the Petition to Intervene for the above referenced matter.

Sincerely,


Steven A. Wolf
Attorney-in-Charge
Government Services Section

SAW:bw1/ JUSTICE-#2977875-v1.DOC

Enclosures

c w/encl: Gordon Feighner, CUB (via email)
G. Catriona McCracken, CUB (via email)
John C. Sturm, CUB (via email)
Jon Cray, PUC (via email)
Kay Marinos, PUC (via email)
Elaine Divilbliss, Virgin Mobile USA, LLC (via email)
Judith Endjan, Attorney (via email)
Kristin L. Jacobson, Sprint Nextex (via email)
Paul Graham, DOJ (via email)

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1522

In the Matter of,

VIRGIN MOBILE USA LLC

Application for Limited Designation as an
Eligible Telecommunications Carrier.

PETITION TO INTERVENE

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

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1 OEM requests that service of documents also be made on:

2 Mark Tennyson
3 Director, Technology and Response Section
4 Oregon Office of Emergency Management
5 Anderson Readiness Center
6 P.O. Box 14370
7 Salem, OR 97306-5062
8 mark.tennyson@state.or.us

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

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

14 The issues petitioner intends to raise at the proceeding:

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

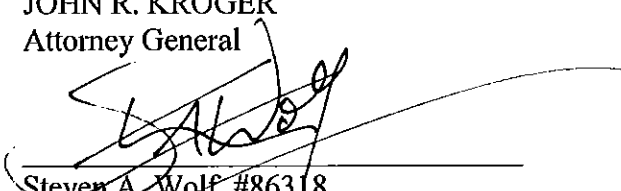
18 Any special knowledge or expertise of the petitioner that would assist the Commission in
19 resolving the issues in the proceeding:

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

23 DATED this 19th day of August 2011.

Respectfully submitted,

JOHN R. KROGER
Attorney General

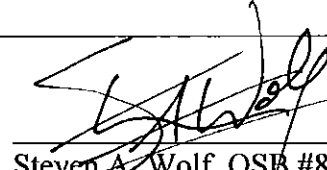

Steven A. Wolf, #86318

Attorney-in-Charge
Of Attorneys for Office of Emergency
Management Division, State of Oregon
steven.wolf@doj.state.or.us

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of August 2011, I served a true copy of the foregoing PETITION TO INTERVENE upon each party listed in the UM 1522 OPUC Service List by electronic mail and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

Gordon Feighner, Energy Analyst Citizens Utility Board of Oregon 610 SW Broadway - Suite 400 Portland, OR 97205 gordon@oregoncub.org	Kristin L. Jacobson Sprint Nextel 201 Mission St. – Suite 1500 San Francisco, CA 94105 kristin.l.jacobson@sprint.com
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John C. Sturm, Staff Attorney Citizens Utility Board of Oregon 610 SW Broadway - Suite 400 Portland, OR 97205 john@oregoncub.org	Public Utility Commission Kay Marinos P.O. Box 2148 Salem, OR 97308-2148 kay.marinos@state.or.us
Elaine Divelbliss Virgin Mobile USA LLC 10 Independence Blvd. Warren, NJ 07059 elain.divelbliss@virginmobileusa.com	Paul Graham Business Activities Section 1162 Court Street NE Salem, OR 97301-4096 paul.graham@state.or.us
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