



PO Box 97061 Redmond, WA 98073

425-580-8112 Phone 425-580-8652 Fax cindy manheim@att com

April 2, 2012

Carol Hulse Oregon Public Utility Commission 550 Capitol St., NE Suite 215 Salem, OR 97301

Re: **UM 1547**

Dear Ms. Hulse:

Enclosed for filing in the above entitled matter, please find an original and five (5) copies of the Petition to Intervene, including Certificate of Service, of AT&T Communications of the Pacific Northwest, Inc., TCG Joint Venture holdings, Inc d/b/a TCG Oregon and AT&T Mobility LLC and its subsidiaries operating in Oregon.

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

Sincerely, Cynthin Manhair by Dae with permission

Cynthia Manheim General Attorney

Attachment

BEFORE THE PUBLIC UTILITIES COMMISSION OF OREGON

UM 1547

In the Matter of)
PUBLIC UTILITY COMMISSION OF OREGON STAFF,) PETITION TO INTERVENE BY) AT&T)
Investigation of Call Termination Issues.)

AT&T Communications of the Pacific Northwest, Inc., TCG Joint Venture

Holdings, Inc d/b/a TCG Oregon and AT&T Mobility LLC and its subsidiaries operating
in Oregon (collectively "AT&T") hereby submit this Petition to Intervene pursuant to

OAR 860-012-0001 in the above-referenced docket.

I. Name and Address of Petitioners

AT&T Communications of the Pacific Northwest, Inc. One AT&T Way, Room 2B115E, Bedminster, NJ 07921

TCG Joint Venture Holdings, Inc. d/b/a TCG Oregon One AT&T Way, Room 2B115E, Bedminster, NJ 07921

AT&T Mobility LLC 1025 Lenox Park Blvd. NE, Atlanta, GA 30319

II. Name and Address of Petitioners' Attorney and Representative

Petitioners will be represented in this proceeding by:

Cindy J. Manheim¹
General Attorney
AT&T
PO Box 97061
Redmond, WA 98073
(425) 580-8112 (telephone)
(425) 580-8333 (facsimile)
cindy.manheim@att.com

Marc M. Carlton, OSB #992375 WILLIAMS, KASTNER & GIBBS PLLC 888 SW Fifth Avenue, Suite 600 Portland, OR 97204 (503) 228-7967 (telephone) (503) 222-7261 (facsimile) mcarlton@williamskastner.com

¹ A Pro Hac Vice Motion will be filed separately.

In addition, AT&T requests that the following representatives be on the service list, and paper service for AT&T is waived:

Sharon L. Mullin
Director – External Affairs
AT&T Services, Inc.
400 W. 15th St., Ste. 930
Austin, TX 78701
(512) 879-2280 (telephone)
(832) 213-0203 (facsimile)
slmullin@att.com

David Collier
Area Manager – Regulatory Affairs
AT&T Services, Inc.
645 E. Plumb Lane, Rm. C-142
P.O. Box 11010
Reno, NV 89520
(775) 333-3986 (telephone)
(775) 333-2364 (facsimile)
david.collier@att.com

III. Nature and Extent of Petitioner's Interest in This Proceeding

This docket is a request for investigation into intrastate call termination issues.

AT&T has already received several discovery requests by Staff in this matter and has replied accordingly. As such, AT&T has a direct and substantial interest in the outcome of this issue.

IV. The Issues the Petitioner Intends to Raise in the Proceedings

AT&T generally intends to address or comment on various call completion issues raised in this docket. AT&T's appearance will not unreasonably broaden the issues, burden the record, or delay this proceeding.

V. <u>Petitioner's Special Knowledge or Expertise, if any, that would assist the Commission in Resolving the Issues in the Proceedings</u>

AT&T has participated in other state proceedings regarding call completion issues and will endeavor to assist the Commission in resolving any issues that are raised in this proceeding.

VI. Conclusion

AT&T respectfully requests that the Commission grant its Petition to Intervene in this docket with all of the rights afforded a full party under Oregon law and the Commission's rules.

DATED this 2nd day of April, 2012.

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC. TCG Joint Venture Holdings, Inc d/b/a TCG Oregon, AT&T Mobility LLC

WILLIAMS, KASTNER & GIBBS PLLC

USB 072849

By: for Marc Carllen

Marc M. Carlton, OSB #992375

CERTIFICATE OF SERVICE UM 1547

I hereby certify that on the 2nd day of April, 2012, 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 (denoted with a "W".)

Ron L. Trullinger (W) Manager-Oregon Regulatory CenturyLink 310 SW Park Ave 11 th Fl. Portland, OR 97205 ron.trullinger@centurylink.com	William E. Hendricks (W) Attorney CenturyLink, Inc. 902 Wasco St A0412 Hood River, OR 97031 tre.hendricks@centurylink.com	G. Catriona McCracken (W) Legal Counsel/Staff Atty Citizens' Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 catriona@oregoncub.org
OPUC Dockets (W) Citizens' Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 dockets@oregoncub.org Brant Wolf (W) Executive Vice President Oregon Telecommunications Assn 777 13 th St SE – STE 120 Salem, OR 97301-4038 bwolf@ota-telecom.org	Johanna Riemenschneider (W) PUC Staff - DOJ Business Activities Section 1162 Court St. NE Salem, OR 97301-4796 johanna.riemenschneider@doj.state.or.us Craig Phillips (W) Oregon Exchange Carrier Assn 1104 Main St., #300 Vancouver, WA 98660 cphillips@oeca.com	Jason W Jones (W) PUC Staff - DOJ Business Activities Section 1162 Court St. NE Salem, OR 97301-4796 jason.w.jones@state.or.us Richard A. Finnigan (W) Attorney at Law Law Office of Richard A. Finnigan 2112 Black Lake Blvd SW Olympia, WA 98512 rickfinn@localaccess.com
Malia Brock (W) Public Utility Commission of OR PO Box 2148 Salem, OR 97308 malia.brock@state.or.us		

DATED this 2nd day of April, 2012.

AT&T

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