### BEFORE THE PUBLIC UTILITY COMMISSION

### OF OREGON

### **UM 1648**

	)
In the Matter of	)
	) UNITED STATES
PUBLIC UTILITY COMMISSION OF	) CELLULAR
OREGON,	) CORPORATION'S
	) PETITION TO INTERVENE
Staff Investigation into Eligible	) AND WAIVER OF PAPER
Communication Carriers' Requirements	) SERVICE
•	)

# PETITION TO INTERVENE OF UNITED STATES CELLULAR CORPORATION

United States Cellular Corporation ("USCC") hereby respectfully petitions the Public Utility Commission of Oregon ("Commission") for leave to intervene in the above-captioned proceeding.

In support of its petition, USCC states as follows:

I.

USCC's name and address are:

United States Cellular Corporation 8410 West Bryn Mawr Avenue Chicago, IL 60631-3486

ΙΙ.

All correspondence in this matter should be directed to:

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USCC has an interest in the subject matter of this proceeding. USCC is a facilities-based commercial mobile radio service ("CMRS") provider in Oregon. USCC is designated as an Eligible Telecommunications Carrier ("ETC") and Eligible Telecommunications Provider ("ETP") in Oregon. The Commission granted USCC ETC status in Order No. 04-356 in Docket No. UM 1084, on June 24, 2004. The Commission granted USCC ETP status in Order No. 04-681 in Docket No. UM 1178, on November 22, 2004. USCC's status as an ETC currently requires annual recertification filings with the Commission. The requirements for those filings, and for recertification, are among the issues identified for consideration in this docket. USCC would be directly impacted by any change in policies or requirements adopted by the Commission concerning the annual recertification process. USCC therefore submits this Petition to Intervene because it is materially interested in, and will be substantially affected by, the Commission's resolution of the issues presented in this proceeding.

IV.

USCC expects to participate in the docket and to contribute its perspective as a CMRS ETC to the investigation. USCC will address such issues as it deems relevant in this proceeding.

V.

USCC has knowledge and expertise that will assist the Commission and the parties in addressing the issues presented in this proceeding.

<sup>&</sup>lt;sup>1</sup> In the Matter of United States Cellular Corporation Application for Designation as an Eligible Telecommunications Carrier, Oregon Public Utility Commission Docket No. UM 1084, Order No. 04-356 (entered June 24, 2004)

<sup>&</sup>lt;sup>2</sup> In the Matter of United States Cellular Corp Application for Designation as an Eligible Telecommunications Provider, Oregon Public Utility Commission Docket No. UM 1178, Order No. 04-681 (entered November 22, 2004).

USCC's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

VII.

USCC waives paper service in this proceeding.

### **CONCLUSION**

For the reasons stated above, USCC respectfully requests that its Petition to Intervene be granted.

DATED this \_\_\_\_\_ day of March, 2013.

DAVIS WRIGHT TREMAINE LLP

By:\_\_\_\_\_\_

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## UM 1648 CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2013, the foregoing UNITED STATES CELLULAR CORPORATION'S PETITION TO INTERVENE AND WAIVER OF PAPER SERVICE was served on the following persons by email:

W=Waive Paper service	C=Confidential HC=Highly Confidential	
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