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March 14, 2013

**VIA E-MAIL AND U.S. MAIL**

Filing Center  
Oregon Public Utility Commission  
PO Box 2148  
Salem, OR 97308-2148

Re: Docket UM 1648

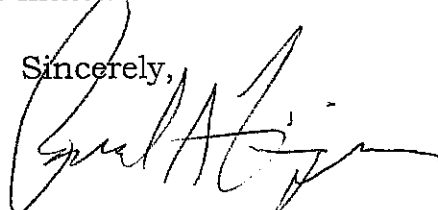
Dear Sir/Madam:

Enclosed is the Petition to Intervene in this docket on behalf of the Oregon Telecommunications Association.

Please note that the original and one copy of the Petition are enclosed. The Certificate of Service is also enclosed.

Thank you for your attention to this matter.

Sincerely,



RICHARD A. FINNIGAN

RAF/cs  
Enclosures

cc: Service List (via e-mail)

1  
2  
3  
4  
5 BEFORE THE PUBLIC UTILITY COMMISSION  
6 OF OREGON

7 UM 1648

8 In the Matter of

9 PUBLIC UTILITY COMMISSION OF  
10 OREGON

11 Staff Investigation into Eligible  
12 Communication Carriers' Requirements

PETITION TO INTERVENE OF THE  
OREGON TELECOMMUNICATIONS  
ASSOCIATION

13 Pursuant to OAR 860-013-0021, the Oregon Telecommunications Association ("OTA")  
14 submits this Petition to Intervene in the above-referenced docket.

15 1. Name and address of the Petitioner:

16 Oregon Telecommunications Association  
17 777 13th Street SE, Suite 120  
18 Salem, OR 97301

19 2. Name and address of attorney. The contact information for Petitioner's counsel is to be  
20 included on the service list.

21 Richard A. Finnigan  
22 2112 Black Lake Blvd. SW  
23 Olympia, WA 98512

24 3. In addition, OTA requests the following representative on the service list:

25 Brant Wolf, CAE, Executive Vice President  
26 Oregon Telecommunications Association  
777 13th Street SE, Suite 120

PETITION TO INTERVENE - 1

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1 Salem, OR 97301

2 4. Nature and extent of Petitioner's interest in the proceedings:

3 Petitioner is appearing on behalf of its incumbent local exchange company members. These  
4 members currently qualify as eligible telecommunications carriers and would be affected  
5 by any changes in eligibility or operating requirements. Some OTA members may intervene  
in this proceeding on their own behalf.

6 5. The issues Petitioner intends to raise at the proceeding:

7 Petitioner will raise only those matters that are directly related to the issues raised in this  
8 matter.

9 6. Any special knowledge or expertise of the Petitioner which would assist the Commission in  
10 resolving the issues in the proceeding:

11 OTA, through its members, has substantial experience in dealing with eligible  
12 telecommunications carrier issues.

13  
14 Respectfully submitted this 14th day of March, 2013.

15  
16 By: 

17 RICHARD A. FINNIGAN, OSB No. 965357  
18 Attorney for Petitioner

CERTIFICATE OF SERVICE  
UM 1648

I certify that I sent the attached Petition to Intervene of the Oregon Telecommunications Association by electronic mail and U.S. mail to the following:

FILING CENTER  
PUBLIC UTILITY COMMISSION OF OREGON  
PO BOX 2148  
SALEM, OR 97308-2148  
puc.filingcenter@state.or.us

I hereby certify that I served the attached Petition to Intervene of the Oregon Telecommunications Association upon all parties of record in this proceeding by electronic mail, pursuant to OAR 860-013-0070, to the following parties or attorneys of parties:

Kay Marinos  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148  
kay.marinos@state.or.us

Dated at Olympia, WA this 14th day of March, 2013.

By: 

RICHARD A. FINNIGAN, OSB No. 965357  
Attorney for the Oregon Telecommunications  
Association