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February 6, 2014

VIA E-Filing and Overnight Mail

Patrick Power, ALJ Oregon Public Utility Commission 3930 Fairview Industrial Dr SE Salem, OR 97302-1166

Re: Docket UM 1684

Dear Judge Power:

Enclosed for filing in the above entitled matter, please find an original and one (1) copy of the Petition to Intervene, including Certificate of Service for AT&T Mobility, LLC and its affiliates operating in Oregon, AT&T Corp. and Teleport Communications America LLC.

Also, please remove Ann Sagerson from the service list as she was involved in Docket AR 574 but is replaced by Cindy Manheim in Docket UM 1684.

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

Sincerely,

David Collier Area Manager

Attachment

BEFORE THE PUBLIC UTILITIES COMMISSION OF OREGON

UM 1684

In the Matter of)
) PETITION TO INTERVENE BY
PUBLIC UTILITY COMMISSION OF) AT&T
OREGON)
)
Investigation into the Oregon Telephone)
Assistance Program and Lifeline Marketing)
Practices.)
)

AT&T Mobility, LLC and its affiliates operating in Oregon, AT&T Corp. and Teleport America, LLC (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 Mobility, LLC 1025 Lenox Park Blvd. NE, Atlanta, GA 30319 AT&T Corp. One AT&T Way, Room 2B115E, Bedminster, NJ 07921 Teleport Communications America LLC One AT&T Way, Room 2B115E, Bedminster, NJ 07921

II. Name and Address of Petition's Attorney and Representative

Petitioner will be represented in this proceeding by the following attorney:

Cindy Manheim
General Attorney
AT&T Services, Inc.
16331 NE 72nd Way, Rm. 1164B
Redmond, WA 98052-7827
(425) 580-8112 (telephone)
(425) 580-8333 (facsimile)
cindy.manheim@att.com

In addition, AT&T requests that the following representatives be on the service list:

Sharon L. Mullin
Director – External Affairs
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Please note that petitioner's attorney and other representatives all waive paper service.

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

This docket is a request for investigation into the issue of the Oregon Telephone
Assistance Program ("OTAP") and Lifeline Marketing Practices.

AT&T has a direct and substantial interest in the outcome of this issue as AT&T Mobility LLC is a provider of OTAP and Lifeline and has been actively involved in related lifeline issues before the OPUC. As such, AT&T has an interest to make sure that this application is resolved in a reasonable, competitively neutral and nondiscriminatory manner.

IV. <u>Issues the Petitioner intends to raise at the Proceeding</u>

AT&T generally intends to address or comment on various issues raised in this docket regarding marketing practices related to the Oregon Telephone Assistance Program and Lifeline Program.

V. <u>Special Knowledge or Expertise of the Petitioner that would assist the Commission in resolving the Issues in this Proceeding</u>

AT&T has been active in multiple FCC proceedings regarding lifeline and USF practices and has vast experience regarding these issues for other states in which AT&T provides services. AT&T's knowledge and expertise regarding this issue will assist the Commission in making a well-informed decision.

Based on the information provided above, and in accordance with the Commission's rules of procedure, AT&T requests to participate in this proceeding as an intervenor. AT&T's participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Dated: February 6, 2014

AT&T Mobility, LLC and its affiliates, AT&T Corp. and Teleport Communications America LLC

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CERTIFICATE OF SERVICE

UM 1684

I hereby certify that on the 6th day of February, 2014, I 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.

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(W) = Waive Paper Service

DATED this 6th day of February, 2014

AT&T

By:

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