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March 16, 2023

**VIA E-FILING**

Public Utility Commission of Oregon  
PO Box 1088  
Salem, OR 97308-1088

Re: Oregon Telephone Corporation and Affiliates Request for Waiver of Certain Rules

Dear Sir/Madam:

This letter is filed on behalf of the Oregon Telephone Corporation (OTC) and its affiliated companies consisting of Helix Telephone Co., Home Telephone Company, North-State Telephone Co. and Pine Telephone System, Inc. These companies all use the same business name of Rally Networks.

In interest of efficiency and ease of access, the Rally Networks companies desire to move away from a paper telephone directory and maintaining paper tariffs. Instead, the Rally Networks companies desire to provide Internet based directories and tariffs.

The first rule that the Rally Networks companies request a waiver from is OAR 860-034-0040(5). This rule requires a small telecommunications utility to “give its residential customers a written summary of their rights and responsibilities” when service is initiated and not less than once each year thereafter. The rule goes on to state that this requirement may be satisfied “by prominent publication of the information and the telephone directory distributed to its customers annually.” While the rule does not specifically require the distribution of the paper directories, the inference contained in the rule is that a paper directory will be published.

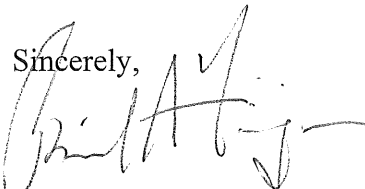
The Rally Networks companies intend to fully comply with OAR 860-034-0040 through an annual notice as well as providing information to new customers. However, the Rally Networks companies respectfully request a waiver from this rule to the extent that it can be read as requiring a paper directory.

The second request for waiver addresses OAR 860-034-0040(2). This rule requires that each company must “keep on file and open for public inspection at its offices, complete rate schedules, contract forms, rules and regulations of the utility, and a copy of the Commission's rules and regulations.” Each of the Rally Networks companies have received an exemption from

ORS 759.175 and are not required to file tariffs with the Commission. The Rally Networks companies will make their tariffs available online and will provide a link to the Commission's website for the Commission's rules and regulations.

On that basis, the Rally Networks companies respectfully request a waiver of OAR 860-034-0040(2) that they keep on file and open for public inspection at its offices, complete rate schedules, contract forms, rules and regulations of the utility and a copy of the Commission's rules and regulations. These materials will be provided online and the requirement to maintain paper copies should be waived.

Thank you for your consideration of this matter.

Sincerely,  
  
RICHARD A. FINNIGAN

RAF/cs

cc: Client (via e-mail)  
Stephanie Yamada (via e-mail)