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October 8, 2012

VIA ELECTRONIC AND U.S. MAIL

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

Re: Docket No. UM 1511 – T-Mobile West Corporation's Amended Application for Designation as an Eligible Telecommunications Carrier for the Limited Purpose of Lifeline-Only Support

Enclosed for filing in the above captioned docket are an original and five copies of the Stipulation and the Joint Testimony in Support of Stipulation. A copy of this filing has been served on all parties to this proceeding as indicated on the enclosed Certificate of Service.

Please contact this office with any questions.

Very truly yours,

A handwritten signature in black ink that reads "Wendy McIndoo". The signature is written in a cursive, flowing style.

Wendy McIndoo

cc: Service List

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1511**

4 In the Matter of T-Mobile West LLC's
5 Application for Designation as an Eligible
6 Telecommunications Carrier.

STIPULATION

7 Certain parties to this case have entered into a Stipulation for the purpose of resolving
8 all issues related to T-Mobile West LLC's ("T-Mobile's" or "the Company's") request for
9 Designation as an Eligible Telecommunications Carrier ("ETC") and as an Eligible
10 Telecommunications Provider ("ETP") for purposes of participating in the Oregon Telephone
11 Assistance Program ("OTAP").

12 **PARTIES**

13 1. The parties to this Stipulation are T-Mobile, Staff of the Public Utility Commission
14 of Oregon ("Staff"), and the Citizens' Utility Board of Oregon ("CUB") (together, "the Parties").
15 This Stipulation will be made available to the other parties to this docket, who may participate
16 by signing and filing a copy of the Stipulation.¹

17 **BACKGROUND**

18 2. On December 8, 2010, T-Mobile West Corporation filed an initial Application for
19 Designation as an Eligible Telecommunications Carrier and Request for Supplemental
20 Certification on Use of Funds.

21 3. Administrative Law Judge ("ALJ") Allan J. Arlow convened a prehearing
22 conference on March 3, 2011. Pursuant to the prehearing conference order, Staff convened a
23 workshop on April 28, 2011. The Parties and U.S. Cellular Corporation ("U.S. Cellular")
24 participated in the workshop.

25 _____
26 ¹ U.S. Cellular participated in settlement conferences and does not oppose the Stipulation. Oregon
Cable Telecommunications Association did not participate in any docket activities.

1 4. On June 2, 2011, T-Mobile filed direct testimony in support of its initial
2 Application.

3 5. On June 14, 2011, the Parties and U.S. Cellular met for a scheduled settlement
4 conference. The parties to the settlement conference agreed to continue settlement
5 discussions at the next scheduled settlement conference set for July 13, 2011, and requested
6 that the procedural schedule be suspended in the interim.

7 6. On June 22, 2011, ALJ Arlow granted the request to suspend the procedural
8 schedule pending the July 13, 2011 settlement.

9 7. The Parties and U.S. Cellular convened a settlement conference on July 13,
10 2011 and continued settlement discussions after that date.

11 8. On November 18, 2011, the Federal Communications Commission ("FCC")
12 issued its USF/ICC Transformation Order (FCC 11-161), in which it modified the required
13 supported services in 47 C.F.R. § 54.101 and the additional requirements for designation as
14 an ETC in 47 C.F.R. § 54.202.

15 9. On February 6, 2012, the FCC issued its Lifeline Reform Order (FCC 12-11) that
16 addressed Lifeline issues relevant to the Company's Application.

17 10. The Company filed an Amended Application for Designation as an Eligible
18 Telecommunications Carrier for the Limited Purpose of Lifeline-Only Support ("Amended
19 Application") and for designation as an ETP on April 20, 2012.² The key changes that the
20 Company's Amended Application made to the Application were: (1) requesting Lifeline-only
21 support rather than both Lifeline and high-cost support; (2) modifying the proposed ETC
22 Designated Service Area; and (3) incorporating requirements set forth in the FCC's USF/ICC
23 Transformation Order and Lifeline Reform Order.

24 ² Since the filing of its Amended Application, T-Mobile West Corporation was converted to a Delaware
25 limited liability company, and the name of the company is now T-Mobile West LLC. T-Mobile West LLC
26 filed a letter on August 2, 2012 indicating it does not seek to effect any change to the Amended
Application as a result of the conversion.

AGREEMENT

1
2 11. The Parties agree that the Company's Amended Application meets the
3 requirements for designation as an Eligible Telecommunications Carrier set forth in
4 Commission Order No. 06-292 and the relevant provisions of 47 Code of Federal Regulations
5 Section 54, and the requirements for designation as an ETP as set forth in the Commission's
6 administrative rules governing the Residential Service Protection Fund ("RSPF"), specifically
7 Oregon Administrative Rules (OARs) 860-033-0001 through 860-033-0046.

8 12. T-Mobile agrees to fulfill all commitments made in the Amended Application. T-
9 Mobile's designated service area shall be comprised of the wire centers listed in Exhibit A of
10 its Amended Application and shall include federally-recognized Tribal lands located within
11 those wire centers.

12 13. T-Mobile will offer a combined Lifeline/OTAP monthly discount of \$12.75, which
13 consists of \$9.25 from the federal program and \$3.50 from the Residential Service Protection
14 Fund. T-Mobile will voluntarily contribute an additional \$0.75 to the combined \$12.75
15 Lifeline/OTAP discount for a total benefit of \$13.50 to the eligible customer. T-Mobile will
16 provide a 30-day notice to Commission staff prior to reducing or eliminating the \$0.75
17 voluntary contribution amount.

18 14. The Parties support the Amended Application and request that the Commission
19 approve the Amended Application.

20 15. This Stipulation will be offered into the record as evidence pursuant to OAR 860-
21 001-0350(7). The Parties agree to support this Stipulation throughout this proceeding and any
22 appeal, provide witnesses to sponsor this Stipulation at hearing, if needed, and recommend
23 that the Commission issue an order adopting the Stipulation.

24 16. If this Stipulation is challenged by any other party to this proceeding, the Parties
25 agree that they will continue to support the Commission's adoption of the terms of this
26 Stipulation. The Parties reserve the right to cross-examine witnesses and put in such

1 evidence as they deem appropriate to respond fully to such issues presented including the
2 right to raise issues that are incorporated in the settlements embodied in this Stipulation.

3 17. The Parties have negotiated this Stipulation as an integrated document. If the
4 Commission rejects all or any material portion of this Stipulation or imposes additional material
5 conditions in approving this Stipulation, any Party shall have the right to withdraw from the
6 Stipulation, along with any other rights provided in OAR 860-001-0350(9), including the right
7 to present evidence and argument on the record in support of the Stipulation, and shall be
8 entitled to seek reconsideration pursuant to OAR 860-001-0720.

9 18. By entering into this Stipulation, no Party shall be deemed to have approved,
10 admitted, or consented to the facts, principles, methods, or theories employed by any other
11 Party in arriving at the terms of this Stipulation, other than as specifically identified in the body
12 of this Stipulation. No Party shall be deemed to have agreed that any provision of this
13 Stipulation is appropriate for resolving issues in any other proceeding, except as specifically
14 identified in this Stipulation.

15 19. This Stipulation may be executed in counterparts and each signed counterpart
16 shall constitute an original document.

17 This Stipulation is entered into by each Party on the date entered below such Party's
18 signature.

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STAFF

By: _____

Date: _____

CUB

By: 

Date: 10-3-2012

T-MOBILE

By: _____

Date: _____

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STAFF

CUB

By: Johan - Penner-schmidt By: _____

Date: 10-3-12 Date: _____

T-MOBILE

By: _____

Date: _____

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STAFF

CUB

By: _____

By: _____

Date: _____

Date: _____

T-MOBILE

By: Sal R. L.

Date: 10/5/2012

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Certificate of Service

I hereby certify that I served a true and correct copy of the foregoing document In Docket UM 1511 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below

Celeste Hari
Public Utility Commission of Oregon
PO Box 2148
Salem OR 97308-2148
celeste.hari@state.or.us

Jon Cray
Public Utility Commission of Oregon
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jon.cray@state.or.us

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Oregon Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
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Gordon Feighner
Citizens' Utility Board of Oregon
610 SW Broadway, Ste 400
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OCTA
1249 Commercial Street SE
Salem, OR 97302
mdewey@oregoncable.com

DATED: October 8, 2012.



Wendy McIndoo
Office Manager

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

Docket No. UM 1511

Joint Testimony of: Celeste Hari, Jon Cray, Rhonda Thomas, and Bob Jenks

In Support of Stipulation

**Stipulating Parties: T-Mobile West LLC, Citizens' Utility Board of Oregon,
and Oregon Public Utility Commission Staff**

In the Matter of

T-MOBILE WEST LLC's

Petition for Designation as an Eligible Telecommunications Carrier

October 8, 2012

1 **Q. WHO IS SPONSORING THIS TESTIMONY?**

2 A. This testimony is jointly sponsored by T-Mobile West LLC (“T-Mobile”), the Staff of the
3 Public Utility Commission of Oregon (“Staff”) and the Citizens’ Utility Board of Oregon
4 (“CUB”).

5 **Q. PLEASE STATE YOUR NAMES AND POSITIONS.**

6 A. My name is Celeste Hari. I am an Analyst in the Telecommunications Division of the
7 Public Utility Commission of Oregon (“Commission”). My witness qualification
8 statement is included as Exhibit Joint/101 to this testimony.

9 My name is Jon Cray. I am the Program Manager of the Residential Service Protection
10 Fund (“RSPF”) of the Central Services Division of the Commission. My witness
11 qualification statement is included as Exhibit Joint/102 to this testimony.

12 My name is Bob Jenks. I am Executive Director of CUB. My witness qualification
13 statement is included as Exhibit Joint/103 to this testimony.

14 My name is Rhonda Thomas, I am Regulatory Manager for the Universal Service –
15 Eligible Telecommunications Carrier Program at T-Mobile. My witness qualification
16 statement is included as Exhibit Joint/104 to this testimony.

17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

18 A. The purpose of our testimony is to describe and support the stipulation (“Stipulation”)
19 among T-Mobile, Staff, and CUB, which supports T-Mobile’s request for designation as
20 an Eligible Telecommunications Carrier (“ETC”) and Eligible Telecommunications
21 Provider (“ETP”) by the Commission for the purposes of providing Lifeline and Oregon
22 Telephone Assistance Program (“OTAP”) services.

1 **Q. DOES THE STIPULATION RESOLVE ALL OF THE ISSUES IN THIS**
2 **PROCEEDING?**

3 A. Yes. CUB and Staff agree that T-Mobile's request for designation as an ETC and ETP
4 in Oregon, as described in its Amended Application filed on April 20, 2012, satisfies all
5 applicable legal requirements and will be in the public interest, and request that the
6 Commission issue an order approving the Amended Application.

7 **Q. ARE ALL PARTIES TO THE PROCEEDING SIGNATORIES TO THE**
8 **STIPULATION?**

9 A. No. US Cellular Corporation ("US Cellular") participated in settlement conferences and
10 does not oppose the Stipulation. The Oregon Cable Telecommunications Association
11 ("OCTA") did not participate in any docket activities.

12 **Q. HOW IS YOUR TESTIMONY ORGANIZED?**

13 A. Our testimony is organized as follows:

14 **Section 1** Background

15 **Section 2** Requirements for ETC Designation

16 **Section 3** Requirements for ETP Designation

17 **Section 4** Conclusion

18 **Exhibits**

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SECTION 1: BACKGROUND

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Q. PLEASE DESCRIBE T-MOBILE’S INITIAL FILING AND ACTIVITIES RELATED TO THE ORIGINAL FILING.

A. T-Mobile filed its initial application for ETC and ETP status with the Commission on December 8, 2010. In its initial application, T-Mobile requested ETC status to be eligible to receive both high-cost and low-income federal support, and ETP status to participate in the OTAP, Oregon’s corollary to the federal Lifeline program. CUB, OCTA, and US Cellular (a currently-designated ETC for federal high-cost support), intervened in the docket.

On June 2, 2011, T-Mobile filed direct testimony in support of the Application. On June 14, 2011 and July 13, 2011, CUB, Staff, T-Mobile and U.S. Cellular met for scheduled settlement conferences. The procedural schedule was suspended pending the July 13, 2011 settlement conference.

Q. WHAT FACTORS PROMPTED T-MOBILE TO FILE AN AMENDED APPLICATION?

A. On November 18, 2011, the FCC issued its USF/ICC Transformation Order (FCC 11-161) that modified important aspects of federal universal service support and ETC eligibility for federal high-cost funds. Most significantly for T-Mobile’s initial application, the changes foreclosed any ETC designated with an effective date after 2011 from receiving legacy high-cost support that was the primary object of T-Mobile’s application. In addition, on February 6, 2012, the FCC issued a separate order (FCC 12-

1 11) reforming the low-income (Lifeline) program and implementing new requirements
2 for that program. The order also necessitated changes in the Lifeline portion of the
3 company's application.

4 Therefore, T-Mobile filed an Amended Application on April 20, 2012, to address
5 the new Lifeline requirements and seek ETC designation for only Lifeline federal
6 universal service support, and not high-cost support as in the initial application. The
7 Amended Application also requested ETP designation to participate in the OTAP. The
8 Stipulation recommends approval of the requests made in, and demonstration of
9 eligibility as evidenced by, the Amended Application.

10 **Q. PLEASE DESCRIBE T-MOBILE.**

11 A. T-Mobile is a national facilities-based provider of wireless voice, messaging, and data
12 services serving approximately 33 million mobile customers nationwide. T-Mobile's
13 Amended Application at 2. T-Mobile has its own switching, transport, cell sites and
14 associated telecommunications facilities. In Oregon, T-Mobile has obtained
15 interconnection agreements with twenty-five local exchange carriers and has deployed
16 hundreds of cell sites. T-Mobile's Amended Application at 2. T-Mobile currently
17 employs more than 1100 people within the state of Oregon and holds radio licenses
18 issued by the FCC to provide Commercial Mobile Radio Service ("CMRS") throughout
19 the state of Oregon and specifically within its requested ETC designated service area. T-
20 Mobile's Amended Application at 2. At the time of the filing of its Amended
21 Application, T-Mobile and its corporate affiliates were designated as ETCs in nine states

1 and Puerto Rico, and had requests pending before the FCC and state commissions for
2 numerous other states. T-Mobile's Amended Application at 2-3.

3 **Q. WHAT DOES T-MOBILE PROPOSE TO OFFER TO ELIGIBLE**
4 **LIFELINE/OTAP CUSTOMERS IN OREGON?**

5 A. T-Mobile will offer a combined Lifeline/OTAP monthly discount of \$12.75 (\$9.25 from
6 the federal program and \$3.50 in OTAP support from the RSPF) on all of its generally
7 available post-paid service offerings that include basic telephone service. The company
8 will voluntarily contribute an additional \$0.75 to the combined \$12.75 Lifeline/OTAP
9 discount for a total benefit of \$13.50 to the eligible customer. These service offerings are
10 described more fully in T-Mobile's Amended Application. In addition, the company will
11 offer a post-paid Lifeline/OTAP service for \$6.49 that includes 145 "Whenever
12 Minutes", 500 "night minutes", 500 "weekend minutes", an overage rate of five cents per
13 minute, and an affordable handset. T-Mobile will also offer Tribal Lifeline service for \$1
14 per month to qualifying residents of federally-recognized Tribal lands.

15 **Q. WHAT FINANCIAL SUPPORT WILL T-MOBILE RECEIVE FOR**
16 **LIFELINE/OTAP SERVICES?**

17 A. T-Mobile will receive \$9.25 from the federal Lifeline program and \$3.50 in OTAP
18 support from the RSPF for each non-Tribal Lifeline customer. Support for Tribal
19 Lifeline service is larger and is determined and provided solely by the federal program;
20 there is no OTAP support for Tribal Lifeline service.

21 **Q. WHERE WILL T-MOBILE OFFER LIFELINE/OTAP SERVICES IN OREGON?**

1 A. T-Mobile will offer Lifeline/OTAP services to customers residing in the wire centers
2 listed in Exhibit A and depicted on the map in Exhibit D of its Amended Application.
3 T-Mobile will also offer Tribal Lifeline services to qualified residents of federally
4 recognized Tribal Lands that fall within those areas. T-Mobile represents in its
5 Application that it has wireless coverage throughout the requested designated service
6 area.

7 **Q. WHAT ARE THE LEGAL STANDARDS THAT APPLY TO T-MOBILE'S**
8 **APPLICATION?**

9 A. The federal requirements for ETC designation are set forth in 47 U.S.C. §214(e)(2) and
10 47 C.F.R. Part 54 of the FCC rules. 47 U.S.C. § 214(e)(2) empowers state commissions
11 to designate ETCs to receive federal universal service support. The Oregon requirements
12 for ETC designation were established by the Commission in Order No. 06-292 ("ETC
13 Order") in Docket No. UM 1217. One of those requirements is to offer Lifeline and
14 OTAP services. In order to offer Lifeline and OTAP services in Oregon, an ETC must
15 receive designation as an ETP. ETP requirements are found in the Commission's RSPF
16 Oregon Administrative Rules ("OARs"). Requirements for ETC and ETP designation are
17 addressed in succession below.

18

1 **2. REQUIREMENTS FOR ETC DESIGNATION**

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3 **Q. WHAT DO THE FCC’S RULES REQUIRE FOR CERTIFICATION AS AN ETC?**

4 A. The FCC’s rules require that ETCs offer a number of specific “supported” services and
5 functionalities which generally constitute voice grade access to the public switched
6 network and certain services such as E911. 47 C.F.R. § 54.101. The rules also require
7 that ETCs commit to meet several specific obligations. 47 C.F.R. §§ 54.201, 54.202.
8 The requirements that the Commission adopted in Order No. 06-292 are consistent with
9 FCC rules in effect when the order was issued in June of 2006. In its November 2011
10 USF/ICC Transformation Order and February 2012 Lifeline Reform Order, the FCC
11 modified some of its rules, but none of the changes preclude requirements included in the
12 Commission’s ETC Order. The FCC also added several new requirements for ETCs
13 designated to provide Lifeline services. T-Mobile’s Amended Application addresses
14 these changes and states the company’s commitment to comply with all relevant FCC
15 ETC requirements.

16 **Q. WHAT ARE THE COMMISSION’S REQUIREMENTS FOR ETC**
17 **DESIGNATION IN OREGON?**

18 A. The Commission’s requirements for ETC designation in Oregon are detailed in Appendix
19 A of the ETC Order. To obtain ETC designation, an applicant must file a detailed
20 application demonstrating the following: 1) common carrier status, 2) commitment and
21 ability to provide all supported services throughout the designated service area, 3) types
22 of facilities used to offer supported services (including certain maps), 4) commitment to

1 use support funds only for the intended purposes, 5) commitment to advertise supported
2 services throughout the service area, 6) commitment to offer and advertise Lifeline and
3 OTAP services, 7) ability to remain functional in emergencies, and 8) commitment to
4 meet service quality and consumer protection standards. In addition, the applicant must
5 demonstrate that designation is in the public interest. Lastly, the applicant must agree to
6 file annual reports with the Commission for items that are specified in the ETC Order.

7 **Q. DO CUB AND STAFF AGREE THAT T-MOBILE'S AMENDED APPLICATION**
8 **MEETS THE LEGAL REQUIREMENTS FOR ETC DESIGNATION?**

9 A. Yes.

10
11 **3. REQUIREMENTS FOR ETP DESIGNATION**

12
13 **Q. WHAT ARE THE COMMISSION'S REQUIREMENTS FOR ETP**
14 **DESIGNATION AND OTAP PARTICIPATION?**

15 A. The Commission's requirements for ETP designation and participation in the OTAP are
16 specified in RSPF OAR 860-033-0001 through 860-033-0046. Also, an ETP must agree
17 to adhere to OTAP policies and procedures. The rules describe the general provisions,
18 remittance reports and payment for the monthly RSPF surcharge that funds the support
19 available from the OTAP. An applicant for ETP status must comply with the rules that
20 specify the OTAP discount amount and how it must be applied. The rules define an
21 eligible low-income customer for the Lifeline/OTAP service and also contain accounting,
22 reporting and auditing requirements with which an ETP must comply to enable the

1 Commission to identify and reconcile OTAP disbursements to the ETP. An ETP
2 applicant must agree to abide by all the requirements in the rules and may be entitled to a
3 one-time compensation from the RSPF for enrolling a new Lifeline/OTAP customer. In
4 addition, an ETP must also obtain federal ETC status so it can receive federal Lifeline
5 support to combine with state OTAP support.

6 **Q. DOES T-MOBILE REQUEST WAIVERS OF ANY RSPF RULES?**

7 A. No, T-Mobile does not request, nor does it need, any waivers. Furthermore, it agrees to
8 collect and remit not only the RSPF surcharge, but the Oregon 911 tax applicable to its
9 Lifeline customers, as it currently does for its non-Lifeline customers. T-Mobile's
10 Amended Application at 16.

11 **Q. DOES T-MOBILE AGREE TO FOLLOW ALL RSPF STAFF POLICIES AND**
12 **PROCEDURES?**

13 A. Yes, T-Mobile agrees to do so in its Amended Application. T-Mobile's Amended
14 Application at 18-19. T-Mobile will make available persons to serve as the required
15 contacts with RSPF Staff, and agrees that RSPF Staff will perform the eligibility
16 verification functions for Lifeline/OTAP. T-Mobile also recognizes that Staff is in the
17 process of implementing changes required by the FCC Lifeline Reform Order, and agrees
18 to abide by the resulting requirements. T-Mobile's Amended Application at 19.

19 **Q. IS THERE ANY REASON TO REQUIRE T-MOBILE TO SUBMIT ANY**
20 **SPECIAL REPORTS BEYOND THOSE REQUIRED OF ALL ETCS?**

21 A. No, not at this time. T-Mobile's Lifeline/OTAP service offerings are not of the pre-paid
22 variety. Also, customers are responsible for payment of the monthly charges that remain

1 after application of the Lifeline/OTAP discount in order for service to continue; T-Mobile
2 will not offer a Lifeline/OTAP service that is free (no charge) to the customer.

3 **Q. DO CUB AND STAFF AGREE THAT T-MOBILE'S AMENDED APPLICATION**
4 **MEETS THE COMMISSION'S REQUIREMENTS FOR ETP DESIGNATION?**

5 A. Yes.

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7 **4. CONCLUSION**
8

9 **Q. WHAT DO STAFF AND CUB RECOMMEND REGARDING THE**
10 **STIPULATION?**

11 A. Staff and CUB recommend that the Commission adopt the Stipulation as the basis for
12 resolving any issues in this proceeding, and that the Commission grant T-Mobile
13 designation as an ETC and ETP in Oregon based on the commitments and demonstration
14 made in T-Mobile's Amended Application.

15 **Q. PLEASE SUMMARIZE THE BENEFITS OF T-MOBILE'S DESIGNATION.**

16 A. As explained in the Amended Application, T-Mobile's designation to offer
17 Lifeline/OTAP services in Oregon would provide valuable benefits to qualifying low-
18 income consumers in the state. Several ETCs are currently providing wireless
19 Lifeline/OTAP services in Oregon, but each has its own type of calling plan and options
20 for consumers. T-Mobile is a mature service provider with a proven record of service in
21 Oregon and across the nation. Designation will allow T-Mobile's current qualifying low-
22 income customers to receive help in paying for wireless service, and will provide the

1 opportunity for other qualifying low-income consumers to have yet another choice of
2 Lifeline/OTAP service provider and rate plan options.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 **A. Yes.**

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Um 1511

T-MOBILE WEST LLC

**Exhibit Accompanying
Joint Testimony of: Celeste Hari, Jon Cray,
Rhonda Thomas, and Bob Jenks**

In Support of Stipulation

Exhibit Joint/101

October 8, 2012

WITNESS QUALIFICATION STATEMENT

NAME: Celeste G. Hari

EMPLOYER: Public Utility Commission of Oregon

TITLE: Analyst

ADDRESS: 550 Capitol St. NE, Salem, OR 97310

EDUCATION &
TRAINING

Bachelor of Science in Business Management,
Linfield College, 1999.

Associate of Science degree in Management,
Chemeketa Community College, 1987.

The Basics of Regulation and the Rate Making
Process, New Mexico State University and NARUC,
1993.

Current Issues Facing the Regulatory Process, New Mexico
State University, 1997.

NARUC Annual Regulatory Studies Program, Michigan
State University and NARUC, 1997.

EXPERIENCE: Employed by the PUC since January 1986. Current duties
include: Tariff review and analysis; competitive
telecommunications analysis; analysis and research of
Eligible Telecommunications Provider applications; and
special projects assignments.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Um 1511

T-MOBILE WEST LLC

**Exhibit Accompanying
Joint Testimony of: Celeste Hari, Jon Cray,
Rhonda Thomas, and Bob Jenks**

In Support of Stipulation

Exhibit Joint/102

October 8, 2012

WITNESS QUALIFICATION STATEMENT

NAME: Jon Cray

EMPLOYER: Public Utility Commission of Oregon

TITLE: Residential Service Protection Fund Program Manager, Central Services Division

ADDRESS: 550 Capitol Street NE, Suite 215
Salem, OR 97301-2115

EDUCATION: MS in Communication Sciences and Disorders
East Carolina University, 2002

BS in Communication Sciences and Disorders
East Carolina University, 2000

PROFESSIONAL EXPERIENCE:

Program Manager, Residential Service Protection Fund, Public Utility Commission of Oregon, 2006 – Present
Manage the Oregon Telephone Assistance Program, Telecommunication Devices Access Program and Oregon Telecommunications Relay Service

Contact Center Manager, Communication Service for the Deaf, 2005 – 2006
Managed the California Telephone Access Program call center for the California Public Utilities Commission

Contact Center Supervisor, Communication Service for the Deaf, 2003 – 2006
Managed a team of California Telephone Access Program customer service representatives for the California Public Utilities Commission

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Um 1511

T-MOBILE WEST LLC

**Exhibit Accompanying
Joint Testimony of: Celeste Hari, Jon Cray,
Rhonda Thomas, and Bob Jenks**

In Support of Stipulation

Exhibit Joint/103

October 8, 2012

WITNESS QUALIFICATION STATEMENT

NAME: Bob Jenks

EMPLOYER: Citizens' Utility Board of Oregon

TITLE: Executive Director

ADDRESS: 610 SW Broadway, Suite 400
Portland, OR 97205

EDUCATION: Bachelor of Science, Economics
Willamette University, Salem, OR

EXPERIENCE: Provided testimony or comments in a variety of OPUC dockets, including UE 88, UE 92, UM 903, UM 918, UE 102, UP 168, UT 125, UT 141, UE 115, UE 116, UE 137, UE 139, UE 161, UE 165, UE 167, UE 170, UE 172, UE 173, UE 207, UE 208, UE 210, UE 233, UE 246, UG 152, UG 221, UM 995, UM 1050, UM 1071, UM 1147, UM 1121, UM 1206, UM 1209, and UM 1355. Participated in the development of a variety of Least Cost Plans and PUC Settlement Conferences. Provided testimony to Oregon Legislative Committees on consumer issues relating to energy and telecommunications. Lobbied the Oregon Congressional delegation on behalf of CUB and the National Association of State Utility Consumer Advocates.

Between 1982 and 1991, worked for the Oregon State Public Interest Research Group, the Massachusetts Public Interest Research Group, and the Fund for Public Interest Research on a variety of public policy issues.

MEMBERSHIP: National Association of State Utility Consumer Advocates
Board of Directors, OSPIRG Citizen Lobby
Telecommunications Policy Committee, Consumer Federation of America
Electricity Policy Committee, Consumer Federation of America

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Um 1511

T-MOBILE WEST LLC

**Exhibit Accompanying
Joint Testimony of: Celeste Hari, Jon Cray,
Rhonda Thomas, and Bob Jenks**

In Support of Stipulation

Exhibit Joint/104

October 8, 2012

WITNESS QUALIFICATION STATEMENT

Rhonda R. Thomas
Background Statement
Career History and Accomplishments

Regulatory Manager, Finance
2010 – present

T-Mobile USA, Inc.

Manage all day to day processes relative to Universal Service programs, including establishing, implementing, and documenting processes. Contribute to federal and state advocacy on Universal Service issues. Manage both internal and external audits of Universal Service funding claims. Lead or participate in cross-functional projects that are implicated by Universal Service programs.

Manager, Finance
2006 - 2010

Verizon Wireless

Manage processes relative to Universal Service filings, including creating, implementing, and documenting processes, totaling over \$300 million annually. Manage both internal and external audits of Universal Service funding claims. Lead or participate in cross-functional projects, including integration of multiple Universal Service designated entities to in-house programs both in subsidy receipts and spend as well as compliance.

Sr. Analyst, Regulatory Affairs
2005 - 2006

Alltel Communications, Inc.

Prepare all Universal Service subsidy filings in accordance with applicable rules, company practices and established timelines. Create reports for use in opportunity analysis, revenue forecasting and authorization of filings, often interacting at the Senior VP level. Research requirements and rules related to Regulatory functions as directed Legal and Regulatory Liaison to Customer Services.

Western Wireless Corporation, 1999 – 2005

Manage all regulatory and legal consumer complaints including Small Claims actions. Support Corporate and Regulatory Counsel often working cross functionally and reporting to the Senior Executive level. Proactively and reactively review corporate

policies and procedures for legal and regulatory compliance suggesting and managing changes as necessary. Peak Achievement, Pride in Excellence and Superstar awards winner.

Education and Affiliations

General Education, Concentration in Music Performance, History and Literature, *1990-1993*

Western Washington University, Bellingham, Washington