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Attorney General



MARY H. WILLIAMS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

June 3, 2013

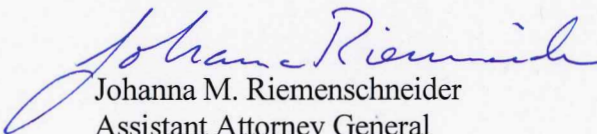
Allan Arlow
Administrative Law Judge
Public Utility Commission of Oregon
550 Capitol St NE – Suite 215
Salem OR 97301

Re: *In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Staff Investigation into Eligible Telecommunications Carriers' Requirements*
PUC Docket No.: UM 1648
DOJ File No.: 860105-GB0226-13

Dear ALJ Arlow:

Enclosed for filing in the above-captioned matter are an original and five copies of the Partial Stipulation.

Sincerely,


Johanna M. Riemenschneider
Assistant Attorney General
Business Activities Section

JMR:jrs/#4291849
(Electronic copy only)
c: UM 1648 Service list

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UM 1648**

4
5 In the Matter of
6 Staff Investigation into Eligible
Telecommunications Carriers' Requirements

PARTIAL STIPULATION

7 **INTRODUCTION**

8 1. The parties to this Stipulation are AT&T Corp., Teleport Communications America
9 LLC, AT&T Mobility LLC (collectively "AT&T"), Boomerang Wireless, LLC,
10 Budget Prepay, Inc., staff of the Public Utility Commission of Oregon ("Staff"),
11 CenturyTel of Oregon, Inc., CenturyTel of Eastern Oregon, Inc., United Telephone
12 Company of the Northwest d/b/a CenturyLink, and Qwest Corporation (collectively
13 "CenturyLink"), the Citizens' Utility Board of Oregon ("CUB"), Cricket
14 Communications, Inc., Frontier Communications Northwest Inc. and Citizen's
15 Telecommunications Co. of Oregon (dba Frontier Communications of Oregon),
16 Nexus Communications Inc., Oregon Telecommunications Association ("OTA"), T-
17 Mobile West LLC ("T-Mobile"), United States Cellular Corp. ("US Cellular"), Warm
18 Springs Telecommunications Company, and YourTel America Inc., collectively
19 referred to as "the Parties." The Parties are the only parties to the above-captioned
20 docket.¹

21 2. By entering into this Partial Stipulation, the Parties intend to resolve the pending issue
22 of the annual reporting requirements in 2013 for recertification of
23 telecommunications carriers eligible to receive federal Universal Service Fund
24

25
26 ¹ Frontier Communications of Oregon filed a Petition to Intervene in this docket on May 14, 2013. No
objections to the petition were filed.

1 support and establish a time to reconsider annual reporting requirements for future
2 reporting years.

3 BACKGROUND

4 3. In Order No. 06-292, the Commission adopted requirements for the annual
5 recertification of telecommunications carriers eligible to receive federal Universal
6 Service Fund (“FUSF”) support from the Federal Communications Commission
7 (“FCC”), commonly referred to as Eligible Telecommunications Carriers (“ETCs”).

8 4. The Commission currently requires Oregon ETCs to file the Oregon-specific annual
9 reports listed in Appendix A of Order 06-292 by July 15 of each year. The
10 Commission established these annual reports to gain sufficient information to enable
11 it to re-certify Oregon ETCs to the FCC by October 1 of each year as required by 47
12 CFR § 54.314, and to monitor ETCs’ ongoing compliance with requirements. These
13 requirements were established based on prior FCC decisions and the testimony and
14 comments submitted in Docket No. UM 1217.

15 5. In November 2011, the FCC issued an order that, in relevant part, provides for new
16 mandatory annual reporting requirements for ETCs receiving high-cost support.
17 Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161
18 (November 18, 2011). In February 2012, the FCC issued an order that includes new
19 annual reporting requirements for ETCs receiving support from the federal Lifeline
20 program for low-income support. Report and Order and Further Notice of Proposed
21 Rulemaking, FCC 12-11 (February 6, 2012). FCC annual reporting procedures are
22 developing. High-cost annual reporting requirements are currently largely reflected
23 in FCC regulations, specifically 47 CFR § 54.313. Reporting requirements for ETCs
24 receiving Lifeline support are reflected in 47 CFR § 54.422. In addition, annual
25 reporting requirements for ETCs receiving Connect America Fund (“CAF ICC”)
26 support are provided in 47 CFR § 54.304 and annual reporting requirements for ETCs

1 receiving Mobility Fund support are set forth in 47 CFR § 54.1009. These annual
2 reports are due to the FCC by July 1 of each calendar year.²

3 6. The FCC annual reports cover many of the same items that are included in the
4 Oregon reports. The FCC requires ETCs to submit copies of their FCC reports to
5 state commissions. The new FCC reports may result in duplication of reporting for
6 ETCs and increased burdens on ETCs that can be reduced if the Oregon reporting
7 requirements are modified for 2013.

8 7. The Commission opened this Docket to review and consider changes to the
9 requirements for designation and annual recertification of ETCs. The Docket
10 addresses these issues in two phases, with Phase I designated to address ETC annual
11 reporting requirements and Phase II to address initial requirements of ETC
12 designation.

13 8. In Phase I, the Parties participated in a workshop on April 15, 2013. ETCs must
14 submit their new annual FCC reports to the FCC by July 1 of this year. Due to the
15 time constraints presented by this deadline, the Parties agreed to first address the issue
16 of 2013 reporting requirements, as reflected in this Partial Stipulation.

17 9. By amending the reporting requirements in Order 06-292 for the 2013 reporting year,
18 the Parties may better assess the necessity of any longer-term amendments. The issue
19 of the annual reports for ETC recertification in 2014 and subsequent years can be
20 evaluated in light of the 2013 recertification process after October 1, 2013.

21 **PARTIAL STIPULATION**

22 1. The Parties agree to request that the Commission amend Order 06-292 to add the
23 following provisions to page 18 of the Order:

24
25 ² The Universal Service Administration Company (USAC) has stated the 2013 reports under 47 CFR §
26 54.422 are due on July 1, and the July 1 deadline is included on the current draft FCC Form 481. But this
draft has not been finalized by the Office of Management and Budget, and the FCC has not established a
formal deadline for filing the information required by 47 CFR § 54.422.

1 5. Other than the filing of a network improvement plan update as
2 required in this order for competitive carriers, eligible telecommunications
3 carriers shall not be required to file the annual set of Oregon carrier
4 reports for ETC recertification that would be due by July 15, 2013. In lieu
5 of filing the 2013 reports, each carrier shall comply with the following:

6 a. Each carrier shall file with the Commission a copy of each report
7 pertaining to Oregon that the ETC files with the FCC for 2013, pursuant to
8 the following regulations, as applicable:

9 A. 47 CFR § 54.304 (CAF ICC support);

10 B. 47 CFR § 54.313 (high-cost support);

11 C. 47 CFR § 54.422 (low-income support); and

12 D. 47 CFR § 54.1009 (mobility fund support).

13 b. Copies of the foregoing 2013 FCC reports shall be filed with
14 Commission no later than fourteen (14) days after each report is due to be
15 submitted to the FCC. Subsequent updates or revisions to such reports
16 shall be filed no later than five business days following the date any
17 update or revision is submitted to the FCC.

18 c. Each carrier receiving federal high-cost support shall, no later than July
19 15, 2013, file a notarized affidavit from an officer of the carrier company
20 in the form approved by Commission staff certifying that all federal high-
21 cost support received within Oregon was used in the preceding calendar
22 year, and will be used in the coming calendar year only for the provision,
23 maintenance and upgrade of facilities and services for which the support is
24 intended.

25 2. The Parties acknowledge that this Partial Stipulation pertains only to annual reporting
26 requirements as initially set forth in Order 06-292; it does not relieve any carrier of
any special reporting requirements adopted in any other Commission order, nor does
it bar the inclusion of special reporting requirements for any carrier in any future
Commission order.

 3. The Parties acknowledge that when filing a report submitted to the FCC with the
Commission, an ETC may submit a document or a portion of a document to the
Commission under a claim of confidentiality pursuant to OAR 860-001-0070.

- 1 4. The Parties agree that Staff may request clarification of annual reports for 2013 and
2 request additional information related to re-certification of high-cost FUSF support
3 under 47 CFR § 54.314.
- 4 5. The Parties agree that this Partial Stipulation does not alter or limit the reporting
5 obligations of any carrier subject to the current reporting requirements in OAR
6 Chapter 860, Division 33.
- 7 6. The Parties agree to re-visit, in this docket, this issue of the annual reports for ETC
8 recertification after October 1, 2013, to consider whether the reporting requirements
9 set forth in Order 06-292 should be modified for 2014 or any subsequent years.
- 10 7. The Partial Stipulation will be offered into the record of the above-captioned docket
11 pursuant to OAR 860-001-0350. The Parties will support the Partial Stipulation
12 throughout this proceeding and any appeal, provide witnesses to sponsor the
13 Stipulation at any hearing held in the above-captioned docket, and recommend that
14 the Commission issue an order adopting the settlement contained herein.
- 15 8. The Parties have negotiated the Partial Stipulation as an integrated document. If the
16 Commission rejects all or any material portion of the Partial Stipulation, or conditions
17 its approval upon the imposition of additional material conditions, any party
18 disadvantaged by such action shall have the rights provided in OAR 860-001-0350
19 and shall be entitled to seek reconsideration of the Commission's order.
- 20 9. By entering into this Partial Stipulation, no party shall be deemed to have approved,
21 admitted or consented to the facts, principles, methods or theories employed by any
22 other party in arriving at the terms of the Stipulation. No party shall be deemed to
23 have agreed that any part of the Partial Stipulation is appropriate for resolving issues
24 arising in any other proceeding.
- 25 10. The Partial Stipulation may be executed in counterparts and each signed counterpart
26 shall constitute an original document.

1 The Partial Stipulation is entered into by each Party on the date entered below.

2 AT&T CORP., TELEPORT
3 COMMUNICATIONS AMERICA LLC,
4 AT&T MOBILITY LLC

BOOMERANG WIRELESS, LLC

5 Dated: _____

Dated: _____

6 By: _____

By: _____

7
8
9
10 BUDGET PREPAY, INC

CENTURYTEL OF OREGON, INC.,
CENTURYTEL OF EASTERN OREGON,
INC. UNITED TELEPHONE COMPANY
OF THE NORTHWEST DBA
CENTURLINK, QWEST
CORPORATION

11 Dated: _____

Dated: _____

12 By: _____

By: _____

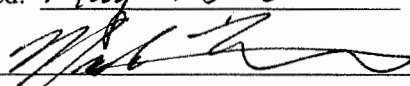
13
14 CITIZENS' UTILITY BOARD OF
15 OREGON

CRICKET COMMUNICATIONS, INC

16 Dated: _____

Dated: May 28 2013

17 By: _____

By: 

18 NEXUS COMMUNICATIONS INC

OREGON TELECOMMUNICATIONS
ASSOCIATION

19 Dated: _____

Dated: _____

20 By: _____

By: _____

21
22
23 T-MOBILE WEST LLC

UNITED STATES CELLULAR CORP

24 Dated: May 28 2013

Dated: May 28 2013

25 By: 

By: 

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2 AT&T CORP., TELEPORT
3 COMMUNICATIONS AMERICA LLC,
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BOOMERANG WIRELESS, LLC

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Dated: _____

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CENTURYTEL OF OREGON, INC.,
CENTURYTEL OF EASTERN OREGON,
INC. UNITED TELEPHONE COMPANY
OF THE NORTHWEST DBA
CENTURYLINK, QWEST
CORPORATION

11 Dated: _____

Dated: _____

12 By: _____

By: _____

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Dated: _____

17 By: _____

By: _____

18 NEXUS COMMUNICATIONS INC

OREGON TELECOMMUNICATIONS
ASSOCIATION

19 Dated: _____

Dated: _____

20 By: _____

By: May 28, 2013
BT Wolf, EVP

21
22
23 T-MOBILE WEST LLC

UNITED STATES CELLULAR CORP

24 Dated: _____

Dated: _____

25 By: _____

By: _____

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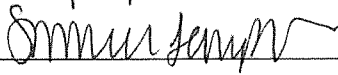
By: _____

13
14 CITIZENS' UTILITY BOARD OF
OREGON

CRICKET COMMUNICATIONS, INC

15 Dated: 5/30/2013

Dated: _____

16 By: 

By: _____

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18 NEXUS COMMUNICATIONS INC

OREGON TELECOMMUNICATIONS
ASSOCIATION

19 Dated: _____

Dated: _____

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By: _____

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3 COMMUNICATIONS AMERICA LLC,
4 AT&T MOBILITY LLC

BOOMERANG WIRELESS, LLC

5 Dated: 5-31-13

Dated: _____

6 By: *Sham Mullis*

By: _____

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10 BUDGET PREPAY, INC

CENTURYTEL OF OREGON, INC.,
CENTURYTEL OF EASTERN OREGON,
INC. UNITED TELEPHONE COMPANY
OF THE NORTHWEST DBA
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11 Dated: _____

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OREGON TELECOMMUNICATIONS
ASSOCIATION

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UNITED STATES CELLULAR CORP

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Dated: _____

25 By: _____

By: _____

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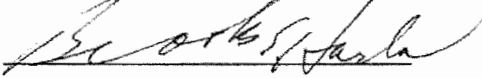
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CENTURYTEL OF EASTERN OREGON,
INC. UNITED TELEPHONE COMPANY
OF THE NORTHWEST DBA
CENTURYLINK, QWEST
CORPORATION

11 Dated: 5-31-13

Dated: _____

12 By: 

By: _____

13 By counsel, Brooks E. Harlow

14 CITIZENS' UTILITY BOARD OF
15 OREGON

CRICKET COMMUNICATIONS, INC

16 Dated: _____

Dated: _____

17 By: _____

By: _____

18 NEXUS COMMUNICATIONS INC

OREGON TELECOMMUNICATIONS
ASSOCIATION

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Dated: _____

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23 T-MOBILE WEST LLC

UNITED STATES CELLULAR CORP

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Dated: _____

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PUBLIC UTILITY COMMISSION STAFF

WARM SPRINGS
TELECOMMUNICATIONS COMPANY

Dated: _____

Dated: _____

By: _____

By: _____

YOURTEL AMERICA INC

FRONTIER COMMUNICATIONS
NORTHWEST INC., CITIZEN'S
TELECOMMUNICATIONS CO.
OF OREGON

Dated: 5/28/2013

Dated: _____

By: [Signature]

By: _____

*for
Ant Butler*

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PUBLIC UTILITY COMMISSION STAFF

WARM SPRINGS
TELECOMMUNICATIONS COMPANY

Dated: _____

Dated: _____

By: _____

By: _____

YOURTEL AMERICA INC

FRONTIER COMMUNICATIONS
NORTHWEST INC., CITIZEN'S
TELECOMMUNICATIONS CO.
OF OREGON

Dated: _____

Dated: May 28, 2013

By: _____

By: *Peace M. Willes*

1 PUBLIC UTILITY COMMISSION STAFF

WARM SPRINGS
TELECOMMUNICATIONS COMPANY

2 Dated: *John R. Reinhardt*

Dated: _____

3 By: *May 31, 2013*

By: _____

4
5
6 YOURTEL AMERICA INC

FRONTIER COMMUNICATIONS
NORTHWEST INC., CITIZEN'S
TELECOMMUNICATIONS CO.
OF OREGON

7 Dated: _____

Dated: _____

8 By: _____

By: _____

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PUBLIC UTILITY COMMISSION STAFF

Dated: _____

By: _____

WARM SPRINGS
TELECOMMUNICATIONS COMPANY

Dated: 5/31/2013

By: Marsha Spellman

YOURTEL AMERICA INC

Dated: _____

By: _____

FRONTIER COMMUNICATIONS
NORTHWEST INC., CITIZEN'S
TELECOMMUNICATIONS CO.
OF OREGON

Dated: _____

By: _____

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By: _____

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INC. UNITED TELEPHONE COMPANY
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CENTURYLINK, QWEST
CORPORATION

11 Dated: _____

Dated: 5/31/13

12 By: _____

By: 

13
14 CITIZENS' UTILITY BOARD OF
15 OREGON

CRICKET COMMUNICATIONS, INC

16 Dated: _____

Dated: _____

17 By: _____

By: _____

18 NEXUS COMMUNICATIONS INC

OREGON TELECOMMUNICATIONS
ASSOCIATION

19 Dated: _____

Dated: _____

20 By: _____

By: _____

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23 T-MOBILE WEST LLC

UNITED STATES CELLULAR CORP

24 Dated: _____

Dated: _____

25 By: _____

By: _____

26

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4 AT&T MOBILITY LLC

5 Dated: _____

6 By: _____

BOOMERANG WIRELESS, LLC

7 Dated: June 3, 2013

8 By: Alan J. Galbraith

9 BUDGET PREPAY, INC

10 Dated: _____

11 By: _____

CENTURYTEL OF OREGON, INC.,
CENTURYTEL OF EASTERN OREGON,
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OF THE NORTHWEST DBA
CENTURYLINK, QWEST
CORPORATION

12 Dated: _____

13 By: _____

14 CITIZENS' UTILITY BOARD OF
15 OREGON

16 Dated: _____

17 By: _____

CRICKET COMMUNICATIONS, INC

18 Dated: _____

19 By: _____

20 NEXUS COMMUNICATIONS INC

21 Dated: June 3, 2013

22 By: Alan J. Galbraith

OREGON TELECOMMUNICATIONS
ASSOCIATION

23 Dated: _____

24 By: _____

25 T-MOBILE WEST LLC

26 Dated: _____

By: _____

UNITED STATES CELLULAR CORP

Dated: _____

By: _____

CERTIFICATE OF SERVICE/SERVICE LIST

I hereby certify that on June 3, 2013, I served the foregoing PARTIAL STIPULATION upon all parties of record in this proceeding by electronic mail only as all parties have waived paper service.

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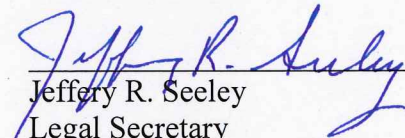
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Brant Wolf
Oregon Telecommunications
Association
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bwolf@ota-telecom.org


Jeffery R. Seeley
Legal Secretary
Natural Resources Section