

**BEFORE THE PUBLIC UTILITY COMMISSION**  
**OF OREGON**  
**UM 1511**

In the Matter of	)	
	)	NOTICE OF INTERVENTION
T-MOBILE WEST CORPORATION	)	(ORS 774.180) OF THE CITIZENS'
	)	UTILITY BOARD OF OREGON
	)	
Application for Designation as an Eligible	)	
Telecommunications Carrier and Request for	)	
Supplemental Certification on Use of Funds.	)	
_____	)	

Pursuant to ORS 774.180 and OAR 860-001-0300 The Citizens' Utility Board of Oregon (CUB) hereby files this Notice of Intervention in this proceeding. Pursuant to ORS 774.180, CUB may intervene in Commission proceedings as of right. In support of this notice of intervention, CUB provides the following information:

- a. The name and address of Intervenor Citizen's Utility Board of Oregon (CUB) is:

Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984

- b. The names and addresses of the attorneys representing the CUB are:

G. Catriona McCracken  
Staff Attorney  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984  
[Catriona@oregoncub.org](mailto:Catriona@oregoncub.org)

- c. CUB requests that service of documents also be made on:

Bob Jenks  
Executive Director  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984  
[Bob@OregonCUB.org](mailto:Bob@OregonCUB.org)

Gordon Feighner  
Utility Analyst  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984  
[Gordon@OregonCUB.org](mailto:Gordon@OregonCUB.org)

- d. Legislation creating the Citizens' Utility Board of Oregon (CUB) was enacted into law in 1985. CUB was created to ensure that utility consumers have an effective advocate to reflect their needs and interests when it comes to public policies affecting the quality and price of utility services. ORS 774.020. CUB's membership averages 4,500 persons per year.
- e. CUB intends to monitor the proceeding and, if necessary, raise issues that are appropriate to the proceeding. No other party could adequately represent the interest of utility consumers.
- f. CUB has participated in Commission proceedings since its inception in 1985.

Dated this 19<sup>th</sup> day of January, 2011.

Respectfully submitted,



John C. Sturm, OSB #105174  
Staff Attorney  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984  
[john@oregoncub.org](mailto:john@oregoncub.org)

## UM 1511 – CERTIFICATE OF SERVICE

I hereby certify that, on this 19<sup>th</sup> day of January, 2011, I served the foregoing **NOTICE OF INTERVENTION (ORS 774.180) OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UM 1511 upon each party listed in the UM 1511 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

**(C denotes service of confidential material authorized)**

**C DEPARTMENT OF JUSTICE**  
PAUL GRAHAM  
ASSISTANT AG  
BUSINESS ACTIVITIES SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
[paul.graham@state.or.us](mailto:paul.graham@state.or.us)

**MCDOWELL RACKNER GIBSON**  
LISA F RACKNER  
ATTORNEY  
419 SW 11TH AVE., SUITE 400  
PORTLAND OR 97205  
[lisa@mcd-law.com](mailto:lisa@mcd-law.com)

**C PUBLIC UTILITY COMMISSION**  
CELESTE HARI  
PO BOX 2148  
SALEM OR 97308-2148  
[celeste.hari@state.or.us](mailto:celeste.hari@state.or.us)

**T-MOBILE USA INC**  
TERI OHTA12920 SE 38TH ST  
BELLEVUE WA 98006  
[teri.ohta@t-mobile.com](mailto:teri.ohta@t-mobile.com)

**PUBLIC UTILITY COMMISSION**  
KAY MARINOS  
PO BOX 2148  
SALEM OR 97308-2148  
[kay.marinosa@state.or.us](mailto:kay.marinosa@state.or.us)

Respectfully submitted,



John C. Sturm, OSB #105174  
Staff Attorney  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 400  
Portland, OR 97205  
(503) 227-1984  
[john@oregoncub.org](mailto:john@oregoncub.org)