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December 6, 2005

**VIA E-MAIL AND FEDERAL EXPRESS**

Ms. Lois Meerdink  
Oregon Public Utility Commission  
550 Capitol Street NE, Suite 215  
Salem, Oregon 97301-2551

Subject: Docket UM-1083; RCC Minnesota, Inc. Errata To OPUC Order No. 04-355

Dear Ms. Meerdink:

RCC Minnesota, Inc. (“RCC”) files this letter requesting the Commission to issue an errata to Order No. 04-355 dated June 24, 2004 (“Order”). The errata is necessary to correct the list of the wire centers in the Order for which RCC has ETC designation (“ETC Designated Wire Centers”). A proposed errata with the correct ETC Designated Wire Centers is attached to this letter as Exhibit One (“Revised Wire Center List”). The Commission staff reviewed this letter prior to filing and supports the relief sought by RCC.

The background for this errata is as follows. RCC filed an application seeking ETC designation in certain wire centers in Oregon on May 12, 2003. The Commission opened a docket to evaluate the application. After conducting a proceeding, the Commission issued the Order granting ETC designation to RCC for the wire centers identified in a map attached as Appendix A to the Order (attached hereto as Exhibit Two) and for the wire centers listed in Appendix B to the Order (attached hereto as Exhibit Three). See Order at 16.

RCC and the OPUC staff recently reviewed Appendix B to the Order and believe that edits to Appendix B are necessary to represent the correct ETC Designated Wire Centers for RCC accurately. Accordingly, RCC requests the Commission to issue an errata correcting the ETC Designated Wire Centers by substituting the Revised Wire Centers List attached as Exhibit One to this letter in place of Appendix B of the Order.

Exhibit Four to this letter explains why the Commission should delete, retain, add or make clarifications regarding particular wire centers. The reasons for doing so fall into one of several categories. First, RCC requests deletion of wire centers in Appendix B that fall outside RCC’s ETC Designated Wire Centers shown in Appendix A to the Order. The “requested action” for these wire centers is listed in Exhibit Four as “delete – outside CGSA.”

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Second, RCC requests the deletion of wire centers from Appendix B that RCC identified in a March 2, 2004 letter to this Commission as being wire centers for which RCC did not seek ETC designation. See Exhibit Four. The "requested action" for these wire centers is listed in Exhibit Four as "delete per March 2, 2004 letter."

Third, RCC requests the addition of the Walla Walla (Oregon) and Spring River wire centers to the list of ETC Designated Wire Centers. These wire centers were identified as ETC Designated Wire Centers on the Appendix A map attached to the Order but were not on the Original Appendix B list. RCC already has ETC designation for the Washington portion of the Walla Walla exchange. RCC included the Spring River wire center in its request for designation in the Bend exchange area.

Fourth, RCC requests the division of "Joseph/Imnaha" into separate wire centers. This accurately reflects their status.

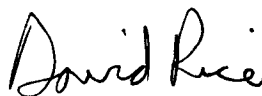
Fifth, RCC requests changing the name of "Pilot Rock/Starkey" to "Pilot Rock," which is the correct name of this wire center.

Sixth, RCC requests deletion of "Stices Gulch" from the list of ETC Designated Wire Centers, because Stices Gulch is not a wire center.

The Commission should exercise its authority under ORS 756.561 to amend the Order, because RCC's proposed revisions will conform the wire center list in the Order with actual wire centers for which RCC sought ETC designation during the UM 1083 proceeding and which the Commission approved by incorporating the map into its Order as Appendix A. Accordingly, the requested amendment is not a substantive change to the original Order. RCC does not waive its right to apply later for ETC designation in any wire center in Oregon, including those deleted from RCC's ETC Designated Wire Center list by this letter.

Please direct any questions to the undersigned.

Sincerely,



David L. Rice

cc: UM 1083 Service List

CERTIFICATE OF SERVICE  
UM 1083

I hereby certify that I have this day served the foregoing upon all parties of record in this proceeding by electronic mail and first-class U.S. Mail, properly addressed with postage prepaid, to the following:

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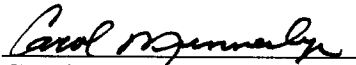
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Dated at Seattle, Washington, this 6<sup>th</sup> day of December, 2005.

  
\_\_\_\_\_  
Carol Munnérlyn, Secretary

# **Exhibit 1**

## **Revised Wire Center List**

**RCC Wire Centers - Corrected List for ETC Designation**  
 UM 1083 Order No. 04-355

<u>ILEC Name</u>	<u>SAC</u>	<u>Wire Centers Listed in Order</u>	<u>CLLI</u>
Qwest Corporation	535163	Athena	ATHNOR
		Baker	BAKROR
		Bend	BENDOR
		Black Butte	BLBTOR
		Hermiston	HMTNOR
		Klamath Falls	KLFLOR
		La Pine	LAPIOR
		Milton Freewater	MLTNOR
		Pendleton	PNTNOR
		Prineville	PRVLOR
		Redmond	RDMDOR
		Sisters	SSTROR
		Spring River	SPRVOR
		Stanfield	STFDOR
Umatilla	UMTLOR		
Walla Walla - OR portion	WLWLWA		
Verizon NW	532416	Cove	COVEOR
		Elgin	ELGNOR
		Enterprise	ENTROR
		Imbler	IMBLOR
		Joseph	JSPHOR
		Imnaha	IMNHOR
		La Grande	LAGROR
		Lostine	LOSTOR
		Union	UNINOR
		Wallowa	WLLWOR
CenturyTel of Eastern Oregon	532360	Bly	BLY OR
		Bonanza	BNNZOR
		Burns	BRNSOR
		Chemult	CHMLOR
		Chiloquin	CHLQOR
		Durkee	DURKOR
		Echo	ECHOOR
		Fort Klamath	FTKLOR
		Gilchrist	GLCHOR
		Harney	NHRCOR
		Huntington	HNTNOR
		John Day	JHDYOR
		Lakeview	LKVVOR
		Long Creek	LGCKOR
		Malin	MALNOR
		Merrill	MRRLOR
		Monument	MNMTOR
North Powder	NPWROR		
Paisley	PSLYOR		
Paulina	PALNOR		
Pilot Rock	PLRKOR		

		Rocky Point Seneca Silver Lake Sprague River Ukiah	RCPNOR SENCOR SLLKOR SRRVOR UKIHOR
United Telephone	532400	Crater Lake	CRLKOR
Asotin Telephone	532404	Flora-Troy	FLTYOR
Eagle Telephone	532369	Richland	RCLDOR
Helix Telephone	532376	Helix Meacham	HELXOR MCHMOR
Malheur Home Tel.	532456	Nyssa Ontario Vale Oregon Slope	NYSSOR ONTROR VALEOR ORSLOR
Midvale Tel.	532226	Harper Juntura	HRPROR JNTROR
Oregon Telephone	532389	Bates Dayville Hereford-Unity Mount Vernon Prairie City	BATSOR DYVLOR HRFROR MTVROR PRCYOR
Pine Telephone	532392	Granite Halfway Oxbow	GRANOR HLWYOR OXBWOR

## **Exhibit 2**

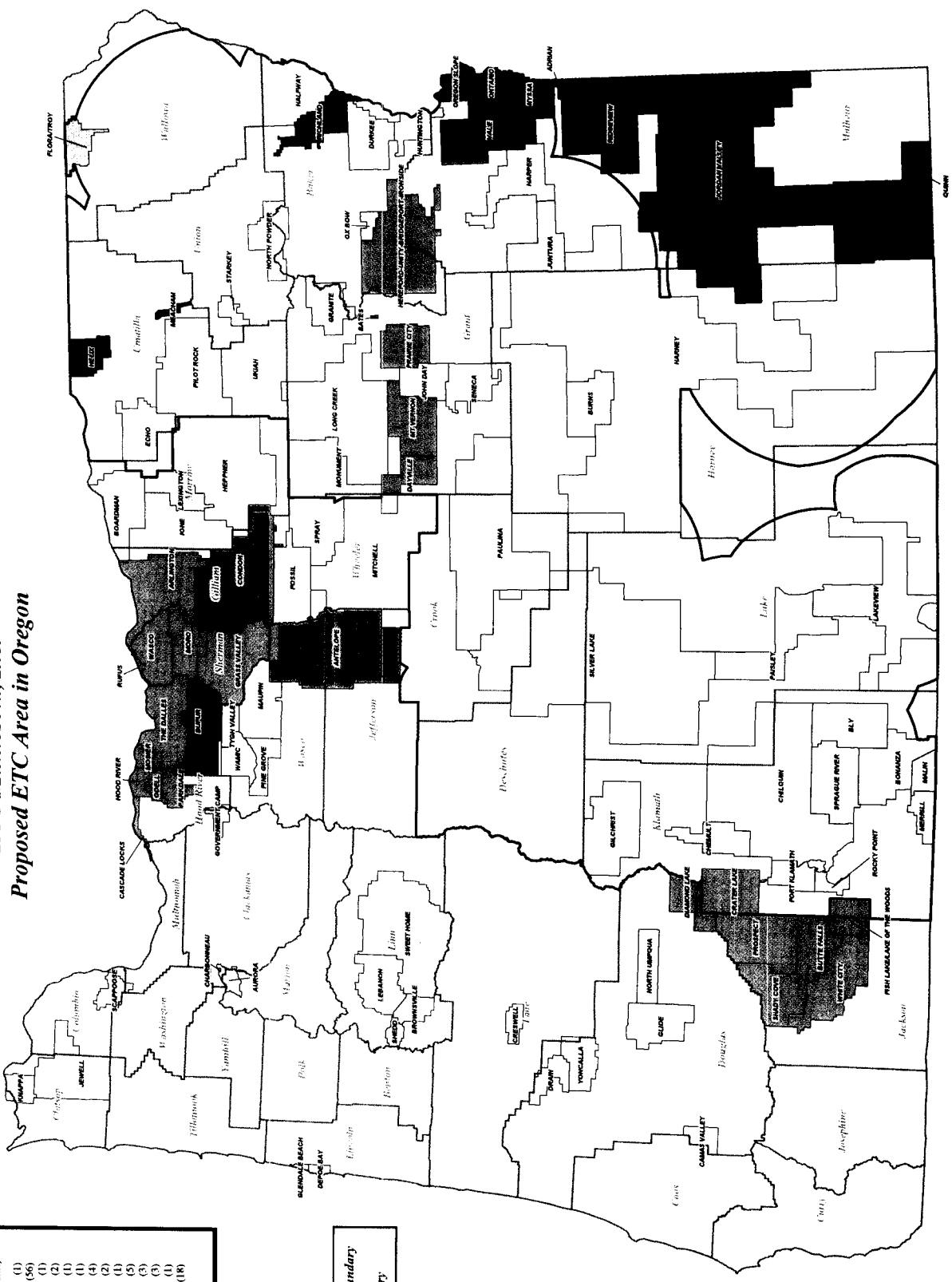
### **MAP**



# RCC Minnesota, Inc. Proposed ETC Area in Oregon

Exchange Boundaries in Oregon (By Company Name)	
	(1) Astoria Telephone Company
	(1) Astoria-Tel
	(96) Clatsop Telephone System, Inc.
	(1) Hais Telephone Company
	(2) Hais Telephone Company
	(1) Hais Telephone Company
	(1) Humboldt Telephone Company
	(4) Multnomah House Telephone Company
	(2) Multnomah Telephone Exchange, Inc.
	(1) Multnomah Telephone Co.
	(1) Oregon Telephone Corporation
	(5) Oregon-Idaho Utilities, Inc.
	(3) Oregon Telephone System, Inc.
	(1) Tana-Cascades Telephone Company
	(18) United Telephone Company of the Northwest

	Proposed ETC Boundary
	County Boundary
	Exchange Boundary



## **Exhibit 3**

# **Appendix B to ETC Designation Order**

## Wire centers served by non-rural carriers

ILEC carrier	Wire Center
Qwest	Albany
Qwest	Ashland
Qwest	Athena
Qwest	Baker
Qwest	Bend
Qwest	Black Butte
Qwest	Blue River
Qwest	Corvallis
Qwest	Dallas
Qwest	Eugene
Qwest	Florence
Qwest	Grants Pass
Qwest	Harrisburg
Qwest	Hermiston
Qwest	Independence
Qwest	Junction City
Qwest	Klamath Falls
Qwest	La Pine
Qwest	Leaburg
Qwest	Lowell
Qwest	Madras
Qwest	Mapleton
Qwest	Marcola
Qwest	Milton Freewater
Qwest	Newport
Qwest	Oakridge
Qwest	Pendleton
Qwest	Prineville
Qwest	Redmond
Qwest	Salem
Qwest	Siletz
Qwest	Sisters
Qwest	Springfield
Qwest	Standfield
Qwest	Toledo
Qwest	Umatilla
Qwest	Veneta

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Qwest	WarmSprings
Qwest	Woodburn

Verizon	Aumsville/Turner
Verizon	Coquille
Verizon	Cove
Verizon	Dayton
Verizon	Detroit
Verizon	Elgin
Verizon	Enterprise
Verizon	Gand Island
Verizon	Imbler
Verizon	Joseph/Imnaha
Verizon	La Grande
Verizon	Lostine
Verizon	Mill City
Verizon	Silverton
Verizon	Union
Verizon	Wallowa
Verizon	Yamhill

Wire centers served by rural carriers -- entire study area to be served by RCC<sup>9</sup>

ILEC carrier	Wire Center	Comments <sup>10</sup>
Asotin	Flora-Troy	Commits to serve entire wire center
Eagle	Richland	Already serves entire wire center
Helix	Helix	Already serves entire wire center
Helix	Meacham	Already serves entire wire center
Malheur	Nyssa	Already serves entire wire center
Malheur	Ontario	Already serves entire wire center
Malheur	Vale	Already serves entire wire center
Mid Vale	Harper	Already serves entire wire center
Mid Vale	Juntura	Already serves entire wire center
Oregon Tel.	Bates	Already serves entire wire center
Oregon Tel.	Dayville	Already serves entire wire center
Oregon Tel.	Hereford-Unity	Already serves entire wire center
Oregon Tel.	Mount Vernon	Already serves entire wire center
Oregon Tel.	Prairie City	Already serves entire wire center
Pine Tel.	Granite	Already serves entire wire center

<sup>9</sup> We differentiate between RCC's coverage of an entire study area as opposed to the partial study area of a rural ILEC, for multiple reasons. First, we apply a cream-skimming analysis to CETC coverage of a partial study area and not to coverage of an entire study area. Second, redefinition of the rural ILEC's service area, with FCC agreement, is required where a CETC has only partial study area coverage.

<sup>10</sup> Where RCC already serves an entire wire center, it does so with its own facilities. Where RCC commits to serve an entire wire center, it will cover part with its own facilities and the rest with resale agreements or additional facilities to be added later.

Pine Tel.	Halfway	Already serves entire wire center
Pine Tel.	Oxbow	Already serves entire wire center
Pine Tel.	Stices Gulch	Already serves entire wire center

Wire centers served by rural carriers -- partial study area to be served by RCC

ILEC carrier	Wire Center	Comments
Century Tel	Bly	Already serves entire wire center
Century Tel	Bonanza	Commits to serve entire wire center
Century Tel	Burns	Already serves entire wire center
Century Tel	Chemult	Already serves entire wire center
Century Tel	Chiloquin	Already serves entire wire center
Century Tel	Durkee	Already serves entire wire center
Century Tel	Echo	Commits to serve entire wire center
Century Tel	Fort Klamath	Already serves entire wire center
Century Tel	Gilchrist	Commits to serve entire wire center
Century Tel	Harney	Commits to serve entire wire center
Century Tel	Huntington	Already serves entire wire center
Century Tel	John Day	Already serves entire wire center
Century Tel	Lakeview	Already serves entire wire center
Century Tel	Long Creek	Already serves entire wire center
Century Tel	Malin	Commits to serve entire wire center
Century Tel	Merrill	Already serves entire wire center
Century Tel	Monument	Commits to serve entire wire center
Century Tel	North Powder	Already serves entire wire center
Century Tel	Paisley	Already serves entire wire center
Century Tel	Paulina	Already serves entire wire center
Century Tel	Pilot Rock/Starkey	Already serves entire wire center
Century Tel	Rocky Point	Already serves entire wire center
Century Tel	Seneca	Already serves entire wire center
Century Tel	Silver Lake	Already serves entire wire center
Century Tel	Sprague River	Already serves entire wire center
Century Tel	Ukiah	Already serves entire wire center
Sprint/United	Crater Lake	Commits to serve entire wire center

## **Exhibit 4**

### **Explanation of Revisions to Original Appendix B**

**RCC Wire Centers - Corrected List for ETC Designation**

UM 1083 Order No. 04-355

<u>ILEC Name</u>	<u>SAC</u>	<u>Wire Centers Listed in Order</u>	<u>CLLI</u>	<u>Recommended Action</u>
Qwest Corporation	535163	<b>Albany</b>		<b>delete per March 2, 2004 letter</b>
		<b>Ashland</b>		<b>delete - outside CGSA</b>
		Athena	ATHNOR	retain
		Baker	BAKROR	retain
		Bend	BENDOR	retain
		Black Butte	BLBTOR	retain
		<b>Blue River</b>		<b>delete per March 2, 2004 letter</b>
		<b>Corvallis</b>		<b>delete per March 2, 2004 letter</b>
		<b>Dallas</b>		<b>delete - outside CGSA</b>
		<b>Eugene</b>		<b>delete per March 2, 2004 letter</b>
		<b>Florence</b>		<b>delete - outside CGSA</b>
		<b>Grants Pass</b>		<b>delete - outside CGSA</b>
		<b>Harrisburg</b>		<b>delete per March 2, 2004 letter</b>
		Hermiston	HMTNOR	retain
		<b>Independence</b>		<b>delete - outside CGSA</b>
		<b>Junction City</b>		<b>delete per March 2, 2004 letter</b>
		Klamath Falls	KLFLOR	retain
		La Pine	LAPIOR	retain
		<b>Leaburg</b>		<b>delete - outside CGSA</b>
		<b>Lowell</b>		<b>delete - outside CGSA</b>
		<b>Madras</b>		<b>delete - outside CGSA</b>
		<b>Mapleton</b>		<b>delete - outside CGSA</b>
		<b>Marcola</b>		<b>delete per March 2, 2004 letter</b>
		Milton Freewater	MLTNOR	retain
		<b>Newport</b>		<b>delete per March 2, 2004 letter</b>
		<b>Oakridge</b>		<b>delete - outside CGSA</b>
		Pendleton	PNTNOR	retain
		Prineville	PRVLOR	retain
		Redmond	RDMDOR	retain
		<b>Salem</b>		<b>delete - outside CGSA</b>
		<b>Siletz</b>		<b>delete per March 2, 2004 letter</b>
		Sisters	SSTROR	retain
		<b>Springfield</b>		<b>delete per March 2, 2004 letter</b>
<b>Spring River</b>	<b>SPRVOR</b>	<b>ADD - was included w/Bend in original filing</b>		
Stanfield	STFDOR	retain		
<b>Toledo</b>		<b>delete per March 2, 2004 letter</b>		
Umatilla	UMTLOR	retain		
<b>Veneta</b>		<b>delete - outside CGSA</b>		
<b>Warm Springs</b>		<b>delete - outside CGSA</b>		
<b>Woodburn</b>		<b>delete - outside CGSA</b>		
<b>Walla Walla - OR portion</b>	<b>WLWLWA</b>	<b>ADD - OR portion of WA-state wire center included on App. A map; RCC is also designated in WA-state portion</b>		
Verizon NW	532416	<b>Aumsville/Turner</b>		<b>delete - outside CGSA</b>
		<b>Coquille</b>		<b>delete - outside CGSA</b>
		Cove	COVEOR	retain
		<b>Dayton</b>		<b>delete - outside CGSA</b>
		<b>Detroit</b>		<b>delete per March 2, 2004 letter</b>
		Elgin	ELGNOR	retain
		Enterprise	ENTROR	retain
		<b>Grand Island</b>		<b>delete - outside CGSA</b>
		Imbler	IMBLOR	retain
		<b>Joseph/Imnaha</b>	<b>IMNHOR</b>	<b>separate wire center - Imnaha</b>
			<b>JSPHOR</b>	<b>separate wire center - Joseph</b>
		La Grande	LAGROR	retain
		Lostine	LOSTOR	retain
		<b>Mill City</b>		<b>delete per March 2, 2004 letter</b>
		<b>Silverton</b>		<b>delete per March 2, 2004 letter</b>
Union	UNINOR	retain		
Wallowa	WLLWOR	retain		



		<b>Yamhill</b>		<b>delete - outside CGSA</b>
CenturyTel of Eastern Oregon	532360	Bly	BLY OR	retain
		Bonanza	BNNZOR	retain
		Burns	BRNSOR	retain
		Chemult	CHMLOR	retain
		Chiloquin	CHLQOR	retain
		Durkee	DURKOR	retain
		Echo	ECHOR	retain
		Fort Klamath	FTKLOR	retain
		Gilchrist	GLCHOR	retain
		Harney	NHRCOR	retain
		Huntington	HNTNOR	retain
		John Day	JHDYOR	retain
		Lakeview	LKVWOR	retain
		Long Creek	LGCKOR	retain
		Malin	MALNOR	retain
		Merrill	MRRLOR	retain
		Monument	MNMTOR	retain
		North Powder	NPWROR	retain
		Paisley	PSLYOR	retain
		Paulina	PALNOR	retain
<b>Pilot Rock/Starkey</b>	PLRKOR	<b>correct to just "Pilot Rock"</b>		
Rocky Point	RCPNOR	retain		
Seneca	SENCOR	retain		
Silver Lake	SLLKOR	retain		
Sprague River	SRRVOR	retain		
Ukiah	UKIHOR	retain		
United Telephone	532400	Crater Lake	CRLKOR	retain
Asotin Telephone	532404	Flora-Troy	FLTYOR	retain
Eagle Telephone	532369	Richland	RCLDOR	retain
Helix Telephone	532376	Helix	HELXOR	retain
		Meacham	MCHMOR	retain
Malheur Home Tel.	532456	Nyssa	NYSSOR	retain
		Ontario	ONTROR	retain
		Vale	VALEOR	retain
		Oregon Slope	ORSLOR	retain
Midvale Tel.	532226	Harper	HRPROR	retain
		Juntura	JNTROR	retain
Oregon Telephone	532389	Bates	BATSOR	retain
		Dayville	DYVLOR	retain
		Hereford-Unity	HRFROR	retain
		Mount Vernon	MTVROR	retain
		Prairie City	PRCYOR	retain
Pine Telephone	532392	Granite	GRANOR	retain
		Halfway	HLWYOR	retain
		Oxbow	OXBWOR	retain
		<b>Stices Gulch</b>		<b>delete - this is not a wire center</b>

# RCC Minnesota, Inc. Proposed ETC Area in Oregon

**Exchange Boundaries in Oregon (By Company Name)**

- Asotin Telephone Company (1)
- CenturyTel (56)
- Eagle Telephone System, Inc. (1)
- Helix Telephone Company (2)
- Home Telephone Company (1)
- Humboldt Telephone Company (1)
- Malheur Home Telephone Company (4)
- Midvale Telephone Exchange, Inc. (2)
- North-State Telephone Co. (1)
- Oregon Telephone Corporation (5)
- Oregon-Idaho Utilities, Inc. (3)
- Pine Telephone System, Inc. (3)
- Trans-Cascades Telephone Company (1)
- United Telephone Company of the Northwest (18)

- Proposed ETC Boundary
- County Boundary
- Exchange Boundary

