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David L. Rice david.rice@millernash.com

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."



Mr. Lois Meerdink December 6, 2005 Page 2

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:

Charles Ferrari Department of Justice 1162 Court St. NE Salem, OR 97301-4096

Richard A. Finnigan 2112 Black Lake Blvd. SW Olympia, WA 98512

Marlin D. Ard
Williard L. Forsyth
Hershner, Hunter, Andrews, Neill & Smith, LLP
180 East 11th Avenue
P. O. Box 1475
Eugene, OR 97440-1475

Alex M. Duarte Qwest 421 SW Oak Street, Suite 810 Portland, OR 97204

Kay Marinos Public Utility Commission of Oregon P. O. Box 2148 Salem, OR 97308-2148

Lawrence Reichman Perkins Coie LLP 1120 N.W. Couch Street, 10th Floor Portland, OR 97209-4128

David A. LaFuria Lukas, Nace, Gutierrez & Sachs, Chartered 1650 Tysons Blvd., Suite 1500 McLean, VA 22102 Brant Wolf Oregon Telecommunications Association 707 13th St. SE, Suite 280 Salem, OR 97301-4036

Renee Willer Schelly Jensen Verizon Northwest, Inc. Post Office Box 1100 Beaverton, OR 97075

James C. Jensen Malheur Home Telephone Co. Post Office Box 249 Ontario, OR 97914-0249

Dated at Seattle, Washington, this day of December, 2005.

Carol Munnerlyn, Secretary

Exhibit 1 Revised Wire Center List

RCC Wire Centers - Corrected List for ETC Designation

UM 1083 Order No. 04-355

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

		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

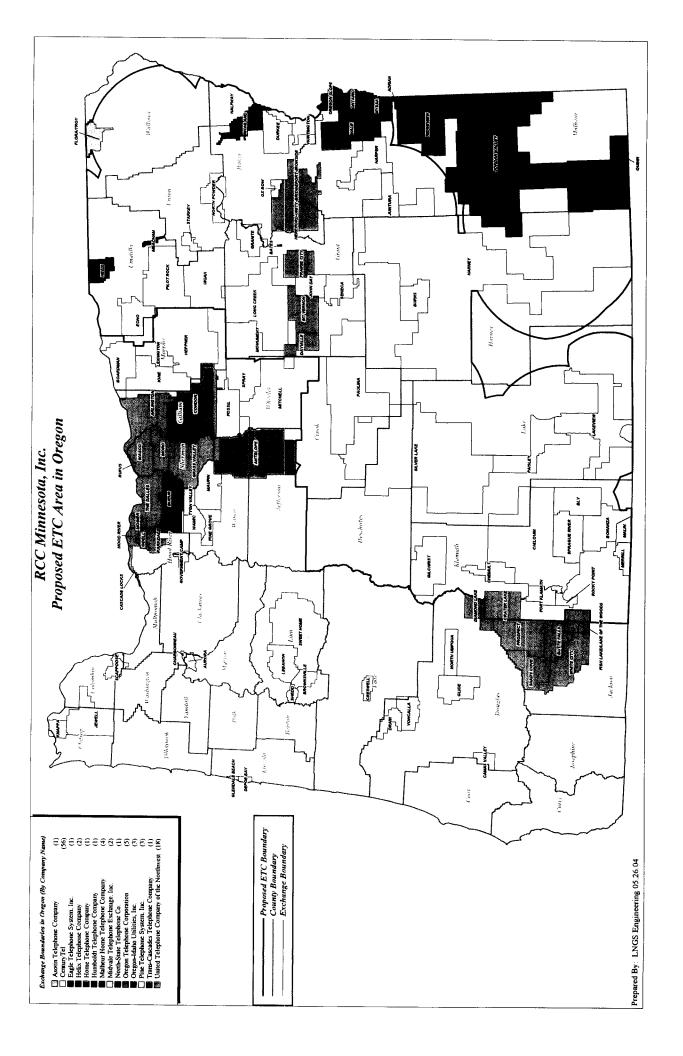


Exhibit 3

Appendix B to ETC Designation Order

UM 1083 Appendix B

Wire centers served by non-rural carriers

Qwest Albany Qwest Ashland Qwest Baker Qwest Bend Qwest Blue River Qwest Blue River Qwest Dallas Qwest Eugene Qwest Florence Qwest Grants Pass Qwest Harrisburg Qwest Hermiston Qwest Junction City Qwest La Pine Qwest Leaburg Qwest Lowell Qwest Madras Qwest Marcola Qwest Marcola Qwest Milton Freewater Qwest Prineville Qwest Prineville Qwest Redmond Qwest Salem Qwest Siletz Qwest Standfield Qwest Toledo Qwest Standfield Qwest Standfield Qwest Toledo	ILEC carrier	Wire Center
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QwestToledoQwestUmatilla	Qwest	
Qwest Umatilla	Qwest	
	Qwest	

ORDER NO. 04-355

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 RCC9

ILEC carrier	Wire Center	Comments ¹⁰
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

⁹ 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.

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	Aleady 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

Lie C Name	UM 1083 Order No. (04-355	Marie O		
Covest Corporation	ILEC Name	SAC		CLLI	Day.
Ashland Ashland Ashlane Ashlane Baker Bake	<u></u>	0/10	Listed in Order	CLLI	Recommended Action
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· ·		Burns	BRNSOR	retain
		Chemult	CHMLOR	retain
		Chiloquin	CHLQOR	retain
		Durkee	DURKOR	retain
		Echo	ECHOOR	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
		Pilot Rock/Starkey	PLRKOR	correct to just "Pilot Rock"
		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
mamour riomo ron	002100	Ontario	ONTROR	retain
		Vale	VALEOR	retain
		Oregon Slope	ORSLOR	retain
		Crogon Glope	ONOLON	retain
Midvale Tel.	532226	Harper	HRPROR	retain
		Juntura	JNTROR	retain
Oregon Telephone	532389	Bates	DATCOD	rotoin
Oregon relephone	332309	Dayville	BATSOR DYVLOR	retain
		Hereford-Unity		retain
		Mount Vernon	HRFROR MTVROR	retain retain
		Prairie City	PRCYOR	retain
Pine Telephone	532392	Granite	GRANOR	retain
,		Halfway	HLWYOR	retain
		Oxbow	OXBWOR	retain
		Stices Gulch	-	delete - this is not a wire center

