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VIA E-FILING AND U.S. MAIL

Oregon Public Utility Commission
Administrative Hearings Division
550 Capitol Street NE Suite 215
Salem OR 97301-2551

Re: Docket No. ARB 621; Traffic Exchange Agreement Amendment
Between St. Paul Cooperative Telephone Association and Sprint
Spectrum L.P./Nextel Operations, Inc.

Dear Sir/Madam:

I would like to submit brief comments in response to Commission Staff's comments in this docket.

The Commission Staff has noted in its comments that an interconnection agreement is not effective until approved by order of the Commission. However, for purposes of applying the pricing, those agreements between ILECs and CMRS providers are authorized by federal law to relate back to the date that a request for interconnection is made. Thus, the rates set forth for the charging of terminating traffic apply as of the date the request was made, not just as of the date of the Commission order. See, 47 C.F.R. 20.11(f) and In the Matter of Developing a Unified Intercarrier Compensation, T-Mobile et. al Petition for Declaratory Ruling Regarding Incumbent LEC Wireless Termination Tariffs, CC Docket No. 01-92, Declaratory Ruling and Report and Order, FCC 05-42 (Released Feb. 24, 2005).

Sincerely,



RICHARD A. FINNIGAN

RAF/km
cc: Nick Schneider