STANLEY E. MARTINSON Direct Dial: (503) 499-4431 E-mail: stan.martinson@bullivant.com

April 14, 2006

## Via Certified Mail Return Receipt Requested

Administrative Hearings Division Oregon Public Utility Commission PO Box 2148 Salem, OR 97308-2148

Re:

Protest concerning application of United Telecom Inc.

Docket No. CP 1320

## Dear Commissioners:

We are attorneys for United Communications, Inc., an Oregon corporation, which filed its articles of incorporation with the Oregon Corporation Division in 1985 and has remained active and in business since that time. We are submitting this letter as a protest against the above-referenced application for authority.

The reason for our protest is that United Telecom Inc. has applied for the identical authority held by United Communications, Inc., and with their names being so nearly the same, it will cause confusion among their customers and the public, and increased administrative time and expense, for both companies to be marketing and providing the same service in the same market.

We have mailed a copy of this protest to United Telecom Inc on the same date as the date of this letter, and have urged them to change the name by which they would operate in Oregon. United Communications, Inc. filed a trademark of its name with the Oregon Corporation Division in 1993, and has maintained that registration since then.

We request a hearing on this matter in order to submit additional testimony as to the confusion and increased administrative time and expense that will be created unless the applicant changes the name by which it markets its services and operates in Oregon.

Oregon Public Utility Commission April 14, 2006 Page 2

Identity and contact information of protestant:

United Communications, Inc. 389 Scalehouse Court, Ste. 100 Bend, OR 97702 (541) 388-8711 TBIDLAKE@UCI.NET

Thank you for your consideration of this protest.

Very truly yours,

Stanley E. Martinson Attorney for Protestant

SEM:cat

cc: Teresa Bidlake

10243089.1 02985-06749

1	CERTIFICATE OF SERVICE
2	I hereby certify that on April 20, 2006, I served the foregoing Protest
3	Concerning Application of United Telecom Inc., Docket No. CP 1320 on the individuals
4	listed below by email and by mailing a correct copy thereof contained in a sealed envelope,
5	with postage prepaid, deposited in the post office at Portland, Oregon on said date and
6	addressed as follows:
7	Jonathan S. Marashlian The Helein Levy Grove P.C.
8	The Helein Law Group PC 8180 Greensboro Dr., Ste. 700
9	McLean, VA 22102 jsm@thlglaw.com
10	
11	United Telecom, Inc. 3350 Wilshire Blvd., 17 <sup>th</sup> Fl.
12	Los Angeles, CA 90010
13	unitedtelecomca@yahoo.com
14	DATED this 20th day of April, 2006.
15	Bullivant Houser Bailey PC
16	A DAMA
17	By Stanley E. Martinson, OSB# 70090
18	Attorney for United Communications, Inc.
19	
20	
21	
22	
23	
24	
25	
26	

888 S.W. Fifth Avenue, Suite 300 Portland, Oregon 97204-2089 Telephone: 503.228.6351 Facsimile: 503.295.0915