

September 12, 2006

**VIA FEDERAL EXPRESS DELIVERY SERVICE
TRACKING NUMBER 8558 6098 1689**

Ms. Diane Davis, Rules Coordinator
State of Oregon Public Utility Commission
550 Capitol Street, NE – Suite 215
Salem, Oregon 97301

Re: In the Matter of a Rulemaking to Amend Division 016 Rules Governing Interconnection Agreements.

Dear Ms. Davis:

Transmitted herein on behalf of Trans National Communications International, Inc. (“TNCI”), please find TNCI’s comments pursuant to the August 30, 2006 Notice of Proposed Rule-Making (Document No. AR 509) in the above-referenced State of Oregon Public Utility Commission (“OPUC”) Proceeding. TNCI is a duly certificated provider of interexchange and competitive local exchange telecommunications services within the State of Oregon and sincerely appreciates this opportunity to provide comments to the OPUC in this important Proceeding. In sum, TNCI generally encourages the OPUC’s proposed amendments to Oregon Administrative Rules 860-016-0020, 860-016-0021, 860-016-0025 & 860-016-0030 and respectfully offers the following points in support thereof.

In TNCI’s view, the OPUC has erred on the side of caution with regard to public interest considerations in allowing the present formal comment period for negotiated Interconnection Agreements (“ICA”) between incumbent and competitive local exchange carriers. ICAs represent important linkages between State of Oregon providers involving the provisioning of telecommunication services which fall under the purview of OPUC authority; as such, it is clearly appropriate for the OPUC to focus on ensuring just, reasonable and non-discriminatory ICAs emerge from negotiated dealings between the interconnecting parties which at their core [the ICAs] serve the public’s interests. However, due to the low numbers of comments the OPUC typically receives, coupled with the routine nature of many ICA filings, the OPUC may reasonably presume its present level of oversight may be lessened. Based on the OPUC’s experience in this matter, it is reasonable to reduce the allowed period of formal public comment to coincide with existing federal law—or, perhaps even represent a period-of-time less than applicable federal law. However, it is the view of TNCI that it would be inappropriate to completely remove the formal commentary option and instead rely solely on the discretion of the OPUC to determine whether a comment period shall be allowed in *all* ICA proceedings.

TNCI urges the OPUC to retain a formal comment period to ensure an opportunity for all parties to comment on ICAs; however, as noted, the period should be reduced to mirror or reasonably approximate timeframes found in similarly situated federal commentary rules. TNCI would respectfully suggest that the OPUC consider implementing a two (2) tiered system wherein “routine” ICAs are “fast-tracked” and bypass more formal comment processes and perhaps be allowed a very short commentary period-of-time; yet, those ICAs that vary from usual and customary norms be scheduled for a longer commentary timeframe.

TNCI at present offers no opinion on the Commission’s proposed modification of arbitration processes.

In conclusion, TNCI generally supports the OPUC’s foregoing proposal. TNCI respectfully requests that the OPUC consider retaining some formal comment period for routine ICA submissions—albeit, less than presently exists. TNCI respectfully suggests the commentary timeframe either mirror or approximate existing federal rules. TNCI has respectfully proposed a two (2) tiered system wherein routine ICAs would receive a greatly abbreviated formal comment period, but unique or novel ICAs would be subject to more scrutiny, at the discretion of the OPUC. Finally, TNCI does not presently have an opinion on the OPUC’s proposed modifications to existing arbitration processes.

TNCI sincerely appreciates your time and attention to this matter. Please direct any questions regarding this filing to the undersigned at (617) 369-1163 or via email at cnance@tncii.com.

Respectfully submitted,

Cameron Nance
Regulatory Affairs Department

cc: file