

May 12, 2020

VIA EMAIL

Via Email: [puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)  
Public Utility Commission of Oregon  
P.O. Box 1088  
Salem, Oregon 97308-1088

Re: UM 2040 – Petition to Intervene of the Oregon Cable Telecommunications Association

To Whom It May Concern:

Attached for filing in the above-referenced docket is the Petition to Intervene of the Oregon Cable Telecommunications Association (“OCTA”). OCTA hereby requests the Administrative Law Judge schedule a telephonic prehearing conference in this matter at the Commission’s earliest convenience.

Sincerely

Davis Wright Tremaine LLP



Mark P. Trincherro

cc: Fawn Barrie (via email)

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

DOCKET NO. UM 2040

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation of the Oregon Universal  
Service Fund.

PETITION TO INTERVENE

NAME OF PETITIONER: Oregon Cable Telecommunications Association

ADDRESS: 1249 Commercial St SE, Salem, OR 97302

PHONE NUMBER: (503) 362-8838

E-MAIL ADDRESS: admin@oregoncable.com

NAME OF COUNSEL FOR PETITIONER: Mark P. Trincherro

COUNSEL'S ADDRESS: Davis Wright Tremaine LLP, 1300 SW Fifth Avenue, Suite  
2400, Portland, Oregon 97201

COUNSEL'S PHONE NUMBER: (503) 778-5318

COUNSEL'S E-MAIL ADDRESS: marktrincherro@dwt.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN  
AND THE PURPOSES OF THE ORGANIZATION:

The Oregon Cable Telecommunications Association ("OCTA") has several cable company members. In addition to cable service, member companies also provide (directly and/or through affiliates) voice, data, video, broadband and wireless services to customers in Oregon. The mission of the OCTA Association is to promote the well-being of the cable telecommunications industry through effective political and public relations, and educational activities.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE  
PROCEEDINGS:

OCTA member companies provide services in direct competition with companies that receive support from the Oregon Universal Service Fund OUSF. Some also pay into the

OUSF. The need for, size of, surcharge in support of, and mechanics the OUSF, therefore, have a direct impact on OCTA members.

**THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDINGS:**

OCTA intends to address any and all issues relevant to the Commission's investigation of the OUSF.

**PETITIONER'S SPECIAL KNOWLEDGE OR EXPERTISE, IF ANY, THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDINGS:**

OCTA has special knowledge of and expertise in the communications industry that will assist the Commission in resolving the issues in this proceeding. OCTA has participated in numerous Commission proceedings, including the Commission's predecessor OUSF docket UM 1481.

**NAMES, ELECTRONIC ADDRESSES, TELEPHONE NUMBERS, AND PHYSICAL ADDRESSES OF THE REPRESENTATIVES THAT PETITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET:**

Fawn Barrie, Executive Director OCTA, 1249 Commercial St SE, Salem, OR 97302; (503) 362-8838; [fbarrie@legadv.com](mailto:fbarrie@legadv.com)

Alan Galloway, Davis Wright Tremaine LLP, 1300 SW Fifth Avenue, Suite 2400, Portland, OR 97201; 503-778-5219; [alangalloway@dwt.com](mailto:alangalloway@dwt.com)

Heather Moelter, Davis Wright Tremaine LLP, 1300 SW Fifth Avenue, Suite 2400, Portland, OR 97201; 503-778-5406; [heathermoelter@dwt.com](mailto:heathermoelter@dwt.com)

Based on the information provided above in accordance with the Commission's rules of procedure, OCTA requests to participate in these proceedings as a party. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or delay the proceedings. OAR 860-001-0300.



Petitioner or Petitioner's Representative

May 12, 2020  
Date