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May 16, 2006

VIA OVERNIGHT MAIL

Administrative Hearings Division
Oregon Public Utility Commission
550 Capitol Street, N.E.
Suite 215
Salem, Oregon 97308

**Re: *Protest concerning application of United Telecom Inc.
Docket No. CP 1320***

Dear Commissioners:

On April 14, 2006, attorneys for United Communications, Inc. ("United Communications") filed a letter with the Oregon Public Utility Commission ("Commission") protesting against the above-referenced application for authority of United Telecom Inc. We are counsel to United Telecom Inc. ("United Telecom") and do hereby file this response to United Communications' protest.

United Telecom requests the Commission deny United Communications' request for hearing and dismiss its protest with prejudice for the following reasons.

United Telecom believes this Commission may lack authority to grant the ultimate objective sought by United Communications. Furthermore, even if the Commission may assert its authority to resolve the concern raised by United Communications, the Commission should defer to the state agency with primary jurisdiction over the relevant matter.

United Communications argues in favor of a Commission directive or order requiring United Telecom to change its corporate name or adopt a fictitious name for purposes of transacting business as a competitive communications provider in the state of Oregon. The basis for this request is United Communications' belief that United Telecom's name may be confused with its own. However, it is not up to this Commission to determine whether or not two corporate names may cause confusion in the public's eye. Rather, this is the duty of the Oregon Secretary of State. United Telecom posits that the Secretary of State has already fulfilled its duties and has concluded that United Telecom's name is not sufficiently similar to United

Communications as to cause confusion. This is confirmed by the fact that on March 10, 2006, the Secretary of State granted United Telecom's application for authority to transact business in Oregon – see attachment – and it did so with full knowledge of United Communications' existing authority granted by the same agency. Had the Secretary of State determined that the names of these two corporations were too similar, it would have denied United Telecom's application. It did not.

For the above reasons, this Commission should not entertain United Communications' request for hearing or take any other action requiring United Telecom to change its corporate name.

Should any questions arise with regard to this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,




Jonathan S. Marashlian
Counsel for United Telecom Inc.

cc: Diane Grajeda

Stanley E. Martinson
Bullivant Houser Bailey
300 Pioneer Tower
888 SW Fifth Avenue
Portland, OR 97204

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Business Name Search

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Business Entity Data

05-16-2006
09:45

Registry Nbr	Entity Type	Entity Status	Jurisdiction	Registry Date	Duration Date	Renewal Date
346335-94	FBC	ACT	CALIFORNIA	03-10-2006		
Entity Name	UNITED TELECOM INC.					
Foreign Name						

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Associated Names

Type	PPB		PRINCIPAL PLACE OF BUSINESS			
Addr 1	3550 WILSHIRE BLVD 17TH FL					
Addr 2						
CSZ	LOS ANGELES	CA	90010		Country	UNITED STATES OF AMERICA

Type	AGT	REGISTERED AGENT	Start Date	03-10-2006	Resign Date	
Of Record	462580-83	NATIONAL REGISTERED AGENTS, INC.				
Addr 1	3533 FAIRVIEW INDUSTRIAL DR SE					
Addr 2						
CSZ	SALEM	OR	97302		Country	UNITED STATES OF AMERICA

Type	MAL	MAILING ADDRESS				
Addr 1	3550 WILSHIRE BLVD 17TH FL					
Addr 2						
CSZ	LOS ANGELES	CA	90010		Country	UNITED STATES OF AMERICA

Type	PRE	PRESIDENT				
Name	SAPINA	QUAYUM				
Addr 1	3550 WILSHIRE BLVD 17TH FL					
Addr 2						

CSZ	LOS ANGELES	CA	90010		Country	UNITED STATES OF AMERICA
Type	SEC	SECRETARY				
Name	DIANE		GRAJEDA			
Addr 1	3550 WILSHIRE BLVD 17TH FL					
Addr 2						
CSZ	LOS ANGELES	CA	90010		Country	UNITED STATES OF AMERICA

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Business Entity Name	Name Type	Name Status	Start Date	End Date
	UNITED TELECOM INC.	EN	CUR	03-10-2006

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Image Date	Action	Transaction Date	Effective Date	Status	Name/Agent Change	Dissolved By
03-10-2006	APPLICATION FOR AUTHORITY	03-10-2006		FI	Agent	

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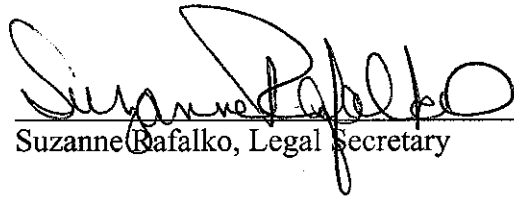


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CERTIFICATE OF SERVICE

I, Suzanne Rafalko, a legal secretary in the Helein Law Group, P.C., do hereby state and affirm that on May 16, 2006, a copy of the foregoing response to the protest concerning the Application of United Telecom, Inc., in Docket No. CP 1320, was served upon the following, via postage-paid United States First Class Mail.

Stanley E. Martinson
Bullivant Houser Bailey
300 Pioneer Tower
888 SW Fifth Avenue
Portland, OR 97204


Suzanne Rafalko, Legal Secretary