



VCI Company
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Via Electronic Mail and U.S. Mail

Public Utility Commission of Oregon
P.O. Box 2148
Salem, OR 97308-2148

Re: Docket No. UM 1107, VCI Company Notice of Relinquishment of ETC Status

Sir/Madam:

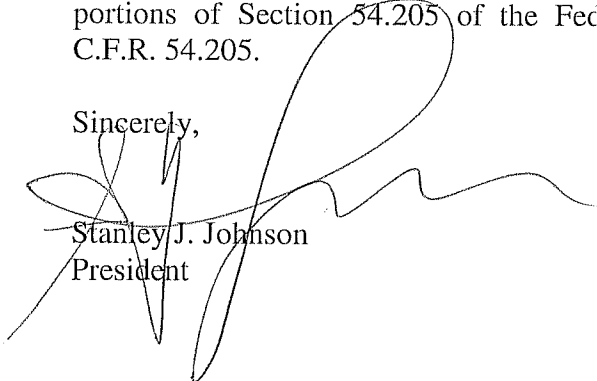
VCI Company ("VCI") is in receipt of the December 13, 2006 comments and recommendations filed by staff in the above referenced docket and strongly disagrees with staff's recommendation that:

....the order also include a statement acknowledging VCI's obligation to pay back any monies that may be found owing to the OTAP fund or the federal low-income fund as a result of the investigation opened on December 5, 2006, in Docket No. UM 1288.

Please take notice that VCI does not waive any rights, now or in the future, to legally challenge or appeal any findings, conclusions or recommendations issued by the Public Utility Commission of Oregon ("Commission") in Docket No. UM 1288 or by any court or tribunal in any appellate proceeding related to Docket No. UM 1288. Also, the Commission does not have jurisdiction over the federal low-income fund and cannot take action with respect to the federal low-income fund. Any Commission order permitting VCI to relinquish its ETC status, or any acknowledgement of such relinquishment, should be issued without the above staff suggested language.

VCI is in agreement with staff's comments that the VCI should be permitted to relinquish its ETC status because it has met or exceeded the obligations set forth in the applicable portions of Section 54.205 of the Federal Communications Commission's rules, 47 C.F.R. 54.205.

Sincerely,



Stanley J. Johnson
President