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**VIA E-FILING**

Oregon Public Utility Commission  
ATTN: Nicola Peterson  
201 High St. SE, Suite 100  
Salem, OR 97301-3398

SUBJECT: Stakeholder Comments by Ziplly Fiber re: Staff Proposal in UM 2040

Ms. Peterson:

This correspondence responds to Staff's invitation to various stakeholders, including Ziplly Fiber, to file straw proposals regarding issues inherent in UM 2040.

Ziplly Fiber has briefly reviewed OTA's proposal and generally concurs with a number of points made therein.

However, given the lack of specific information about the CostQuest model in Staff's straw proposal, Ziplly Fiber is without sufficient information to provide a coherent and constructive response to each of Staff's questions. Whether or not the CostQuest model results in an equitable and nondiscriminatory determination of the cost of basic telephone service is a question that can only be answered after access to details about the model's inputs and presumptions and an analysis by each stakeholder as to whether the model's outputs accurately reflect that stakeholder's need for support.

Ziplly Fiber asks the OPUC to direct Staff to provide any and all information in their possession related to the CostQuest model, the inputs thereto, the service agreement CostQuest has provided the Commission, and all other relevant information that would allow Ziplly Fiber and other respondents to understand in detail how this model operates and to verify the results (to be) produced.

Without that level of transparency, stakeholders are left to speculate about whether many of Staff's preliminary conclusions are justified, and about whether the CostQuest model will actually assist the Commission in accomplishing the statutory goal set out in ORS § 759.425 of establishing and implementing "a competitively neutral and nondiscriminatory universal service fund."

Please direct any questions or concerns to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "George Baker Thomson, Jr.", enclosed in a light gray rectangular box.

George Baker Thomson, Jr.  
Associate General Counsel