Law Office of Richard A. Finnigan

Richard A. Finnigan Paralegal (360) 956-7001 2405 Evergreen Park Drive SW

Suite B-1 Olympia, Washington 98502 Fax (360) 753-6862 Kathy McCrary,

(360) 753-7012 Lisa Skelley, Legal Asst. (360) 753-4679

February 28, 2005

VIA E-MAIL AND U.S. MAIL

Filing Center Oregon Public Utility Commission PO Box 2148 Salem, OR 97308-2148

Re: UM 1176/UM 1177

Dear Sir/Madam:

Enclosed are the original and one copy of the Motion to Withdraw Petition to Intervene. Thank you for your assistance.

Sincerely,

RICHARD A. FINNIGAN

RAF/km Enclosures

cc: Service List

Brant Wolf

1	
2	
3	
4	
5	BEFORE THE PUBLIC UTILITY COMMISSION
6	OF OREGON
7	UM 1176/1177
8	
9	In the Matter of) MOTION TO WITHDRAW
10	EDGE WIRELESS, LLC) PETITION TO INTERVENE
11	Application for Designation as an Eligible) Telecommunications Carrier Pursuant to)
12	ne Telecommunications Act of 1996)
13	The Oregon Telecommunications Association ("OTA"), by and through its attorney of
14	
15	record, Richard A. Finnigan, attorney at law, hereby files this Motion to Withdraw Petition to
16	Intervene ("Motion").
17	DAGIG FOR MORION
18	BASIS FOR MOTION
19	On December 10, 2004, OTA filed its Petition to Intervene in UM 1177. The Petition was
20	subsequently granted.
21	All parties discussed possible resolutions to this docket at a workshop held on January 31,
22	2005. During that workshop, Edge Wireless, LLC ("Edge") committed to filing an Amended
23	Application which would contain certain commitments related to reporting and service that would
24	match the conditions imposed by the Commission on RCC Minnesota, Inc. d/b/a Cellular One and
25	Law Office of Richard A. Finnigan
26	PETITION TO INTERVENE - 1 2405 Evergreen Park Dr. SW Suite B-1
20	Olympia, WA 98502 (360) 956-7001

1 United States Cellular Corporation in Dockets UM 1083 and UM 1084, respectively. OTA has 2 reviewed the Amended Application and believes that Edge has complied with that commitment. 3 On that basis, and on the condition that Edge not withdraw those commitments and that the 4 Oregon Public Utility Commission ("Commission") accepts such commitments, OTA moves to 5 withdraw its Petition to Intervene. 6 7 **RELIEF REQUESTED** 8 Based on the foregoing Motion, OTA respectfully requests that, at the time the Commission 9 rules on Edge's Amended Application, the Commission grant this Motion so long as Edge has not 10 withdrawn the commitments contained in its Amended Application and the Commission has 11 accepted such commitments. 12 13 Respectfully submitted this 28th day of February, 2005. 14 15 By: s/ Richard A. Finnigan RICHARD A. FINNIGAN, OSB# 96535 16 Attorney for Oregon Telecommunications Association 17 18 19 20 21 22 23 24 Law Office of Richard A. Finnigan 25 MOTION TO WITHDRAW 2405 Evergreen Park Dr. SW PETITION TO INTERVENE - 2 Suite B-1 26

Olympia, WA 98502 (360) 956-7001

1 CERTIFICATE OF SERVICE 2 UM 1176/1177 3 I certify that I have this day served the foregoing document upon all parties of record in this proceeding by mailing a copy properly addressed with first class postage prepaid, to the following 4 parties or attorneys of parties: 5 STEPHANIE S ANDRUS MARK P TRINCHERO 6 DEPARTMENT OF JUSTICE DAVIS WRIGHT TREMAINE LLP 1162 COURT ST NE 1300 SW FIFTH AVE STE 2300 7 SALEM OR 97301-4096 PORTLAND OR 97201-5682 stephanie.andrus@state.or.us marktrinchero@dwt.com 8 9 DAVE BOOTH **KAY MARINOS** 10 PUBLIC UTILITY COMMISSION PUBLIC UTILITY COMMISION OF OREGON OF OREGON 11 PO BOX 2148 PO BOX 2148 SALEM, OR 97308-2148 SALEM, OR 97308-2148 12 dave.booth@state.or.us kay.marinos@state.or.us 13 14 Dated at Olympia, WA this 28th day of February, 2005. 15 16 17 By: s/ Richard A. Finnigan RICHARD A. FINNIGAN, OSB# 96535 18 Attorney for Oregon Telecommunications 19 Association 20 21 22 23 24 Law Office of Richard A. Finnigan 25 CERTIFICATE OF SERVICE - 1 2405 Evergreen Park Dr. SW Suite B-1

> Olympia, WA 98502 (360) 956-7001

26