BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1017

In the Matter of))) PETITION TO INTERVENE
PUBLIC UTILITY COMMISSION OF OREGON)
Investigation into Expansion of the Oregon Universal Service Fund to Include the Service Areas of Rural Telecommunications Carriers)))

PETITION TO INTERVENE OF tw telecom of oregon llc

tw telecom of oregon llc ("tw telecom") respectfully petitions the Commission for leave to intervene in the above-captioned proceeding.

In support of its petition, tw telecom states as follows:

tw telecom's primary name and address are:

tw telecom of oregon llc 845 Camino Sur Palm Springs, CA 92262

П.

All correspondence in this matter should be directed to:

Mark P. Trinchero DAVIS WRIGHT TREMAINE LLP 1300 SW Fifth Avenue Suite 2300 Portland, OR 97201

Voice: (503) 778-5318 Fax: (503) 778-5299

Email: marktrinchero@dwt.com

Lyndall Nipps
Vice President, Regulatory Affairs
tw telecom of oregon llc
845 Camino Sur
Palm Springs, CA 92262-6275

Voice: (760) 832-6275

Email: Lyndall.Nipps@twtelecom.com

III.

tw telecom has a substantial interest in this proceeding because, as a competitive telecommunications provider, tw telecom's customers contribute to the Oregon Universal Service Fund. Accordingly, any possible amendments or revisions to the Oregon Universal Service Fund may impact the level of contributions that that tw telecom and its customers must make to the Fund.

IV.

tw telecom expects to participate in the docket and to contribute its perspective as a competing telecommunications service provider and contributor to the Oregon Universal Service Fund. tw telecom will address such issues as it deems relevant in this proceeding.

tw telecom has knowledge and expertise that will assist the Commission and the parties in addressing the issues presented in this proceeding.

VI.

tw telecom's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

CONCLUSION

tw telecom's Petition to Intervene should be granted.

DATED this day of June 2011.

DAVIS WRIGHT TREMAINE LLP

Mark P. Trinehero

1300 SW Fifth Avenue, Suite 2300

Portland, Oregon 97201

P: (503) 778-5318

F: (503) 778-5299 Email: marktrincheo@dwt.com

Attorneys for tw telecom of oregon llc

CERTIFICATE OF SERVICE UM 1017

I hereby certify that the PETITION TO INTERVENE was served on the following persons on June 6, 2011, by email to all parties and by U.S. Mail to parties who have not waived paper service:

CENTURYTEL OF OREGON INC Calvin K. Simshaw Assoc Gen Counsel PO Box 9901 Vancouver WA 98668-8701 Calvin.simshaw@centurytel.com	CITIZENS' UTILITY BOARD OF OREGON Robert Jenks, Executive Director 610 SW Broadway, Suite 308 Portland, OR 97205 bob@oregoncub.org
CITIZENS' UTILITY BOARD OF OREGON G. Catriona McCracken, Legal Counsel/Staff Attorney 610 SW Broadway, Suite 308 Portland, OR 97205 catriona@oregoncub.org	CITIZENS' UTILITY BOARD OF OREGON Raymond Myers, Attorney 610 SW Broadway, Suite 308 Portland, OR 97205 ray@oregoncub.org
EMBARQ COMMUNICATIONS INC Nancy Judy, State Exec 902 Wasco St A0412 Hood River OR 97031 barbara.c.young@centurylink.com	FRONTIER COMMUNICATIONS NORTHWEST INC. Renee Willer External Affairs Manager 20575 NW Von Neumann Dr Beaverton OR 97006-6982 renee.willer@ftr.com
FRONTIER COMMUNICATIONS OF AMERICA INC Joseph D. Chicoine Manager – State Gov Affairs PO Box 340 Elk Grove CA 95759 jchicoin@czn.com	GVNW CONSULTING INC Carsten Koldsbaek, Consulting Manager PO Box 2330 Tualatin OR 97062 ckoldsbaek@gvnw.com
GVNW CONSULTING INC Jim Rennard, Consulting Manager PO Box 2330 Tualatin OR 97062 jrennard@gvnw.com	GVNW CONSULTING INC Jeffry H. Smith Vice President & General Manager PO Box 2330 Tualatin OR 97062 jsmith@gvnw.com

LAW OFFICE OF RICHARD A. FINNIGAN Richard A. Finnigan 2112 Black Lake Blvd SW Olympia WA 98512 rickfinn@localaccess.com	McDOWELL RACKNER & GIBSON PC Lisa F. Rackner 419 SW 11 th Ave Ste 400 Portland OR 97205 lisa@mcd-law.com
OREGON EXCHANGE CARRIER ASSN Craig Phillips 800 C St Vancouver WA 98660 cphillips@oeca.com	OREGON TELECOMMUNICATIONS ASSN Brant Wolf Executive Vice President 777 13 th St SE Ste 120 Salem OR 97301-4038 bwolf@ota-telecom.org
PERKINS COIE LLP Lawrence Reichman 1120 NW Couch St 10 th Fl Portland OR 97209-4128 lreichman@perkinscoie.com	PUC STAFF – DEPARTMENT OF JUSTICE Michael T. Weirich Assistant Attorney General Business Activities Section 1162 Court St NE Salem OR 97301-4096 michael.weirich@doj.state.or.us

Dated: June 6, 2011

Jan Brooker, Davis Wright Tremaine, LLP 1300 SW 5th Avenue, Suite 2300, Portland, OR 97201