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November 22, 2006

VIA ELECTRONIC MAIL & U.S. MAIL

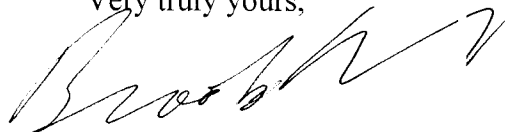
Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol Street NE, Suite 215
P. O. Box 2148
Salem, Oregon 97308-2148

Subject: Docket No. UM 1280 - Petition to Intervene

Dear Filing Center:

Enclosed, for filing, are an original and one copy of the Petition To Intervene on behalf of Rural Cellular Corporation in the above-referenced docket.

Very truly yours,



Brooks E. Harlow

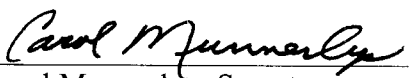
cc w/enc: Parties of Record

CERTIFICATE OF SERVICE
DOCKET UM 1280

I hereby certify that I have this day served a true and correct copy of the foregoing upon all parties of record by electronic mail to the following:

Michael T. Weirich Department of Justice Regulated Utility & Business Section 1162 Court St. NE Salem, OR 97301 Michael.Weirich@state.or.us	Mark P. Trincherro Davis Wright Tremaine LLF 1300 SW Fifth Ave., Suite 2300 Portland, OR 97201 Marktrincherro@dwt.com
Richard A. Finnigan Law Office of Richard A. Finnigan 2112 Black Lake Blvd. SW Olympia, WA 98512 Rickfinn@localaccess.com	Lowrey R. Brown Jason Eisdorfer Robert Jenks Citizens' Utility Board of Oregon 610 SW Broadway, Suite 303 Portland, OR 97205 lowrey@oregoncub.org Jason@oregoncub.org bob@oregoncub.org
William E. Hendricks III Embarq Communications, Inc. 902 Wasco Street Hood River, OR 97031-3103 tre.e.hendricks.iii@mail.sprint.com	

DATED at Seattle, Washington this 22nd day of November, 2006.



Carol Munnery, Secretary

1 **BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

2 **UM 1280**

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4
5
6 In the Matter of
7 The Investigation into Qwest Corporation (and
8 possibly other parties)'s failure to file
interconnection agreements for Commission
approval under Section 252(a)(1) of the
Telecommunications Act

PETITION TO INTERVENE

9 **PETITION TO INTERVENE OF RURAL CELLULAR CORPORATION**

10 Rural Cellular Corporation ("RCC") respectfully petitions the Commission for
11 leave to intervene in the above-captioned proceeding.

12 In support of its petition, RCC states as follows:

13 I.

14 RCC's name and address are:

15 Rural Cellular Corporation, Minnesota, Inc.

16 302 Mountain View Drive, Suite 200

17 Colchester, VT 05446

18 II.

19 All correspondence in this matter should be directed to:

20
21 Elizabeth Kohler
22 Vice President of Legal Services
23 Rural Cellular Corporation, Minnesota, Inc.
24 Suite 200
302 Mountain View Drive
Colchester, VT 05446

Brooks E. Harlow
Miller Nash LLP
4400 Two Union Square
601 Union Street
Seattle, WA 98101-2352

25 Hong N. Huynh
26 Miller Nash LLP
111 SW Fifth Ave, Suite 3400
Portland, OR 97204

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III.

RCC is interested in the issues raised in this proceeding. RCC is an Eligible Telecommunications Carrier ("ETC") that receives federal universal service support in the state of Oregon. Disaggregation of federal universal service support received by rural incumbent local exchange carriers will likely impact the federal universal service support that RCC will receive. Therefore, RCC has an interest in this proceeding.

IV.

RCC will address such issues as it deems relevant in this proceeding, including all issues relevant to competitive ETCs in Oregon.

V.

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

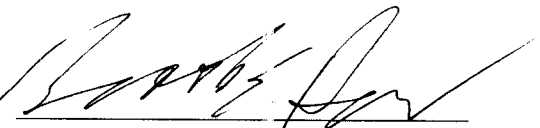
VI.

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

CONCLUSION

RCC's Petition to Intervene should be granted.

DATED this 22nd day of November, 2006.

MILLER NASH LLP

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