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December 21, 2006

Cheryl Walker  
Public Utilities Commission of Oregon  
Attn: Filing Center  
550 Capital Street NE, Suite 215  
P.O. Box 2148  
Salem, Oregon 97308-2148

**RE: Docket No. UM 1280 - Petition to Intervene**

Dear Ms. Walker:

Enclosed for filing in the above-referenced docket are the original and one copy of the Petition to Intervene of Citizens Telecommunications Company of Oregon d/b/a Frontier Communications of Oregon.

Please contact me if you have any questions.

Sincerely,

Ingo Henningsen  
Manager, Government & External Affairs  
Frontier Communications  
P.O. Box 708970  
Sandy, UT 84070-8970  
Telephone: 801-274-3127  
Facsimile: 801-274-3227  
ingo.henningsen@czn.com

Enclosure

cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1280**

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IN THE MATTER OF THE INVESTIGATION    )  
INTO WHETHER RURAL ILECS SHOULD    )    PETITION TO INTERVENE  
DISAGGREGATE UNIVERSAL SERVICE    )  
SUPPORT                                    )

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**PETITION TO INTERVENE OF  
CITIZENS TELECOMMUNICATIONS COMPANY OF OREGON,  
DBA FRONTIER COMMUNICATIONS OF OREGON**

Citizens Telecommunications Company of Oregon, d/b/a Frontier Communications of Oregon (“Frontier”) respectfully petitions the Commission for leave to intervene in the above-captioned proceeding. In support of its petition, Frontier states as follows:

1. The name and address of the petitioner is:

Citizens Telecommunications Company of Oregon  
d/b/a Frontier Communications of Oregon  
9324 W. Stockton Blvd.  
Elk Grove, California 95758

2. All correspondence in this matter should be directed to:

Kevin Saville  
Associate General Counsel  
Frontier Communications  
2378 Wilshire Blvd.  
Mound, MN 55364  
ksaville@czn.com

Ingo Henningsen  
Manager, Government & External Affairs  
Frontier Communications  
P.O. Box 708970  
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3. Nature and extent of petitioner’s interest in this proceeding:

Frontier is an incumbent rural local exchange carrier in Oregon and will therefore be directly affected by any decision that results from the investigation in this docket. This intervention is occurring now so that Frontier can participate as a separate party in this

docket. Originally Frontier's interests were represented through its membership in the Oregon Telecommunications Association, which is already a party. However, Frontier has decided to withdraw from the association. Frontier must therefore now intervene separately in order to monitor and potentially participate in this proceeding.

4. The issues petitioner intends to raise at this proceeding:

Frontier will address issues that it deems relevant in this proceeding. Including those related to the determination of whether rural local exchange carriers should disaggregate Universal service support and if so, how that disaggregation should occur. Frontier's participation will not unreasonably broaden the issues or in any way unreasonably delay this proceeding.

5. Benefit of Frontier's intervention:

As an incumbent rural local exchange carrier in Oregon, Frontier has the knowledge and expertise that will assist the Commission and the parties in resolving this issues presented in this proceeding.

6. Absence of Objections to Frontier's Intervention:

On December 12, 2006, Ingo Henningsen of Frontier sent an E-mail to the other parties in this proceeding explaining that Frontier planned to intervene in the proceeding. Mr. Henningsen requested that the parties identify whether they objected to Frontier's intervention. As of the date of this filing, no party has objected to Frontier's intervention.

Frontier therefore requests that the Commission grant this Petition to Intervene.

Respectfully submitted this 21st day of December, 2006

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Ingo Henningsen  
Manager, Government & External Affairs  
Frontier Communications  
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**CERTIFICATE OF SERVICE  
DOCKET UM 1280**

I hereby certify that I have this day served a true and correct copy of the foregoing, by electronic and/or regular mail, upon the parties listed below.

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Dated this 21st day of December, 2006, at Mound Minnesota.

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