

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2040

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON

Investigation of the Oregon Universal Service
Fund.

PETITION TO INTERVENE OF CTIA

Pursuant to OAR 860-001-0300(2), CTIA¹ submits this Petition to Intervene in the above-captioned docket.

Name and address of Petitioners

CTIA
1400 16th Street, Suite 600
Washington, DC 20036

Name and address of counsel

Timothy R. Volpert
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Portland, OR 97205
(503) 703 9054
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In addition, CTIA requests that the following two counsel should be added to the service list for CTIA:

Benjamin Aron
Matt DeTura
1400 16th Street, Suite 600
Washington, DC 20036

¹ CTIA – The Wireless Association (“CTIA”) (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, and suppliers as well as app and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

(202) 736-3683

Purpose of organization, the number of members, and the purpose of the organization

Responsive information is found in footnote 1. Additionally, CTIA notes that it has well over 200 members number. Many of its members operate in Oregon, including carriers such as AT&T, T-Mobile, US Cellular, and Verizon.

Nature and extent of Petitioner's interest in the proceedings

CTIA is appearing on behalf of its facility-based and mobile virtual network operators that provide service in Oregon. The imposition of any surcharges that wireless carriers are expected to collect in order for the state to distribute to other communications carriers' concerns CTIA member wireless carriers. CTIA is active in state universal proceedings across the country and stresses the importance of technological neutrality, minimizing the funding burden on consumers, programmatic efficiency and transparency, and other related concerns.

The issues Petitioners intend to raise in this proceeding

CTIA expects to raise issues related to those stated in the paragraph immediately above to the extent they are relevant to the Commission's investigation in this docket.

Any special knowledge or expertise of the Petitioners which would assist the Commission in resolving the issues in this proceeding

CTIA has participated in universal service proceedings both across the nation and at the federal level and can offer the Commission its perspective based on that broad experience. Further, CTIA is uniquely situated to provide the Commission with insight into the impacts of imposing universal service surcharges on wireless customers. CTIA's participation in the Commission's recent docket investigating changes to carrier of last resort obligations, where the Commission sought CTIA's input regarding the state of the wireless industry, will also prove instructive.

Respectfully submitted this 21st day of August, 2020.

By: s/ Timothy R. Volpert
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Of Attorneys for CTIA