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May 12, 2020

VIA E-MAIL

Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

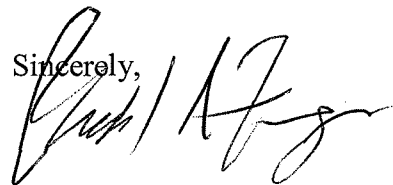
Re: UM 2040 – Joint Petition to Intervene – Oregon Telecommunications Association
and Frontier Communications Northwest, LLC dba Ziplly Fiber

Dear Sir/Madam:

Attached you will find the above referenced Joint Petition to Intervene in this docket for the Oregon Telecommunications Association and Frontier Communications Northwest, LLC dba Ziplly Fiber. The Oregon Telecommunications Association and Frontier Communications Northwest, LLC dba Ziplly Fiber hereby request that a telephonic prehearing conference be scheduled at the Commission's earliest convenience.

If there are any questions concerning this Joint Petition to Intervene, please contact the undersigned.

Sincerely,



RICHARD A. FINNIGAN

RAF/cs
Enclosure

cc: Client (via e-mail)

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5 BEFORE THE PUBLIC UTILITY COMMISSION
6 OF OREGON

7 UM 2040

8 In the Matter of

9 PUBLIC UTILITY COMMISSION OF
10 OREGON

11 Investigation of the Oregon Universal Service
12 Fund.

13 JOINT PETITION TO INTERVENE OF THE
14 OREGON TELECOMMUNICATIONS
ASSOCIATION AND FRONTIER
COMMUNICATIONS NORTHWEST, LLC
15 DBA ZIPLY FIBER

16 Pursuant to OAR 860-001-0300(2), the Oregon Telecommunications Association ("OTA")
17 and Frontier Communications Northwest, LLC dba Ziplly Fiber ("Ziplly Fiber") submit this Joint
18 Petition to Intervene in the above-referenced docket.

19 1. Name and address of the Petitioners:

20 Oregon Telecommunications Association
21 777 13th Street SE, Suite 120
22 Salem, OR 97301

23 Ziplly Fiber
24 4155 SW Cedar Hills Blvd.
25 Beaverton, OR 97005

26 2. Name and address of attorney:

Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, WA 98512

Ziplly Fiber will be represented by Ms. Epley, see below, rather than through counsel.

PETITION TO INTERVENE - 1

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(360) 956-7001

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2 3. In addition, Petitioners request the following representatives on the service list:

3 For OTA:
4 Brant Wolf
5 Oregon Telecommunications Association
6 777 13th Street SE, Suite 120
7 Salem, OR 97301

6 For Ziplly Fiber:
7 Jessica Epley
8 Regulatory & External Affairs Director
9 Northwest Fiber, LLC d/b/a Ziplly Fiber
4155 SW Cedar Hills Blvd.
Beaverton, OR 97005

10 4. If the Petitioner is an organization, the number of members in and the purposes of the
11 organization.

12 OTA has approximately 28 members. OTA is a trade association representing members
13 involved in the provision of local telecommunications services.

14 5. Nature and extent of Petitioner's interest in the proceedings:

15 Petitioner OTA is appearing on behalf of its members, which are largely incumbent local
16 exchange companies serving in the state of Oregon. Petitioner Ziplly Fiber is appearing on behalf of
itself as a contributor to and drawer from the Oregon Universal Service Fund.

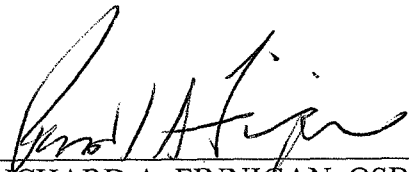
17 6. The issues Petitioners intend to raise at the proceeding:

18 Petitioners will raise only those issues that are directly related to the issues raised in this
19 matter.

1 7. Any special knowledge or expertise of the Petitioners which would assist the Commission in
2 resolving the issues in the proceeding:

3 Petitioner OTA's member companies and Petitioner Ziplly Fiber are very familiar with issues
4 related to universal service and intercarrier compensation issues. Petitioner OTA's member
5 companies and Petitioner Ziplly Fiber will be directly affected by this docket.

6 Respectfully submitted this 12th day of May, 2020.

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9 By: 
10 RICHARD A. FINNIGAN, OSB No. 965357
11 Attorney for Petitioner OTA
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