

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1280

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON

Investigation to determine whether Rural
Incumbent Local Exchange Carriers should
Disaggregate Universal Service Support.

AMENDED PETITION TO INTERVENE

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

On November 24, 2006, ("RCC") petitioned the Commission for leave to intervene in this docket under a petition with an erroneous caption reading "In the Matter of The Investigation into Qwest Corporation (and possibly other parties)'s failure to file interconnection agreements for Commission approval under Section 252(a)(1) of the Telecommunications Act."

RCC now respectfully submits this amended petition to intervene in the docket under the correct caption: "In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Investigation to determine whether Rural Incumbent Local Exchange Carriers should Disaggregate Universal Service Support."

In support of its petition, RCC states as follows:

I.

RCC's name and address are:

Rural Cellular Corporation, Minnesota, Inc.

302 Mountain View Drive, Suite 200

Colchester, VT 05446

II.

All correspondence in this matter should be directed to:

Elizabeth Kohler
Vice President of Legal Services
Rural Cellular Corporation, Minnesota, Inc.
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302 Mountain View Drive
Colchester, VT 05446
Phone: (802) 654-5093
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Brooks E. Harlow
Miller Nash LLP
4400 Two Union Square
601 Union Street
Seattle, WA 98101-2352

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

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.

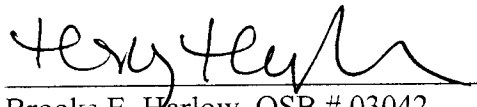
RCC's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

CONCLUSION

RCC's Petition to Intervene should be granted.

DATED this th28 day of November, 2006.

MILLER NASH LLP



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Attorneys for Rural Cellular
Corporation

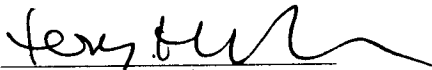
CERTIFICATE OF SERVICE

UM 1280

I hereby certify on this ~~28~~²⁴ day of November, 2006, an Amended Petition to Intervene on behalf of Rural Cellular Corporation, Minnesota, Inc., was sent via UPS overnight mail to the Oregon Public Utility Commission.

Also, a copy of the filing was sent by U.S. mail to the service list which is attached.

MILLER NASH LLP


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November 28, 2006

VIA ELECTRONIC MAIL & U.S. MAIL

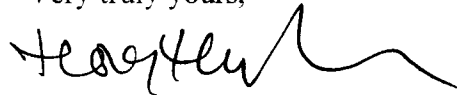
Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol Street NE, Suite 215
P. O. Box 2148
Salem, Oregon 97308-2148

Subject: Docket No. UM 1280 – Amended Petition to Intervene

Dear Filing Center:

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

Very truly yours,



Hong N. Huynh

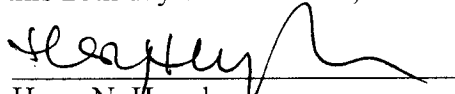
cc w/enc: Parties of Record

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 LLP 1300 SW Fifth Ave., Suite 2300 Portland, OR 97201 Marktrincherro@dwt.com
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DATED at Portland, Oregon this 28th day of November, 2006.



Hong N. Huynh