

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of
OREGON PUBLIC UTILITY COMMISSION
Staff Investigation to Establish Requirements
for Initial Designation and Recertification of
Telecommunications Carriers Eligible to
Receive Federal Universal Service Support

Docket No. UM 1217

OPENING BRIEF OF RCC AND USCC

I. OVERALL

A. WHAT POLICY OBJECTIVES SHOULD THE COMMISSION ATTEMPT TO ACHIEVE THROUGH THIS DOCKET?

The objective of this proceeding should be to ensure a proper framework to permit the federal Universal Service Fund (“USF”) program to operate in Oregon the way Congress intended when it established the fund in The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (“1996 Act”). Exhibit RCC-USCC/1, Wood/4. The 1996 Act promised to “promote competition and reduce regulation,” “secure lower prices and higher quality services . . . and encourage the rapid deployment of new telecommunications technologies.” Pub. L. No. 104-104, 110 Stat. 56, 56 (preamble). Numerous provisions of the 1996 Act instruct the FCC, with varying degrees of specificity, “to promote . . . policies and purposes . . . favoring diversity of media voices, vigorous economic competition, technological

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of
OREGON PUBLIC UTILITY COMMISSION
Staff Investigation to Establish Requirements
for Initial Designation and Recertification of
Telecommunications Carriers Eligible to
Receive Federal Universal Service Support

Docket No. UM 1217
OPENING BRIEF OF RCC AND USCC

I. OVERALL

A. WHAT POLICY OBJECTIVES SHOULD THE COMMISSION ATTEMPT TO ACHIEVE THROUGH THIS DOCKET?

The objective of this proceeding should be to ensure a proper framework to permit the federal Universal Service Fund (“USF”) program to operate in Oregon the way Congress intended when it established the fund in The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (“1996 Act”). Exhibit RCC-USCC/1, Wood/4. The 1996 Act promised to “promote competition and reduce regulation,” “secure lower prices and higher quality services . . . and encourage the rapid deployment of new telecommunications technologies.” Pub. L. No. 104-104, 110 Stat. 56, 56 (preamble). Numerous provisions of the 1996 Act instruct the FCC, with varying degrees of specificity, “to promote . . . policies and purposes . . . favoring diversity of media voices, vigorous economic competition, technological

1 advancement, and promotion of the public interest, convenience, and necessity.” 47 U.S.C.
2 § 257(b). The legislative history of the 1996 Act confirms Congress’s intent “to provide for a
3 pro-competitive, de-regulatory national policy framework designed to accelerate rapidly the
4 private sector deployment of advanced telecommunications and information technologies and
5 services to all Americans by opening all telecommunications markets to competition.” H.R.
6 CONF. REP. NO. 488, 104th Cong., 2d Sess. 113 (1996). Rural areas were not excluded from these
7 principles.

8 While the USF should not be administered merely to promote competition for
9 competition’s sake, the 1996 Act’s universal service provisions play a central role within this
10 pro-competitive legislative package. *See* RCC-USCC/1, Wood/5. Before the 1996 Act,
11 universal service was accomplished through “a combination of explicit monetary payments to
12 local phone companies and implicit subsidies through rate designs,” especially the imposition of
13 “uniform rates throughout a company’s service area, which enabled the company to charge
14 above-cost rates in urban areas to support below-cost rates in rural areas.” *Qwest Corp. v. FCC*,
15 258 F.3d 1191, 1196 (10th Cir. 2001). But contemporary universal service bears little
16 resemblance to traditional schemes focused on extending lifeline rates to low-income customers.
17 Because comprehensive regulatory reform and the opening of local telephone markets threatened
18 to undermine the traditional system of implicit subsidies, the 1996 Act integrated a new universal
19 service mechanism into its market-opening provisions. *See TOPUC*, 183 F.3d at 406; *In re*
20 *Tekstar Communications, Inc.*, Docket No. P-5542/M-01-1865, slip op. at 2 (Minn. Pub. Utils.
21 Comm’n, May 28, 2002).

22 The legislative history of the 1996 Act evinces congressional sensitivity to the
23 erosion of “near-guaranteed returns” under deregulation and to the need for coordinating
24 universal service support with “an orderly transition from a regulated market to a competitive
25 and deregulated market.” *Id.* Congress adopted the principle “that any support mechanisms
26 continued or created under” the new statute “should be explicit, rather than implicit as many

1 support mechanisms” had been. H.R. CONF. REP. NO. 458, 104th Cong., 2d Sess. 131 (1996),
2 *reprinted in* 1996 U.S.C.C.A.N. 124, 142.

3 Congress could not have been clearer in linking the preservation of universal
4 service with its desire to promote “competition for local telephone service by cable, wireless,
5 long distance, and satellite companies, and electric utilities, as well as other entities.” S. REP.
6 No. 23, 104th Cong. 1st Sess. 5 (1995). Thus, it is essential that the USF be administered in a
7 competitively neutral manner. Exhibit RCC-USCC/1, Wood/9. Section 253 of the Act
8 specifically allows states to adopt universal service rules, provided they are competitively
9 neutral. 47 U.S.C. Section 253(b).

10 In addition to promoting competition, the 1996 Act makes it clear that federal
11 policy is to improve service to rural areas, which presently lag behind urban areas in access to
12 telecommunications services. Exhibit RCC-USCC/1, Wood/10-11, 13-14. Indeed, two of the
13 six statutory universal service principles identified in the 1996 Act establish a strong public
14 interest in rural-urban parity. First, the Act promises that universal service will provide “[a]ccess
15 to advanced telecommunications and information services . . . in *all* regions of the Nation.” 47
16 U.S.C. § 254(b)(2) (emphasis added). Second, the Act even more explicitly states that
17 “[c]onsumers in all regions of the Nation, including low-income consumers and those in rural,
18 insular, and high cost areas” should “have access to telecommunications and information
19 services, including interexchange services and advanced telecommunications services, that are
20 reasonably comparable to those services provided in urban areas and that are available at rates
21 that are reasonably comparable to rates charged for similar services in urban areas.” *Id.*
22 § 254(b)(3).

23 The USF is designed to bring a number of benefits to rural customers. Long
24 distance as well as local service is an integral component of universal service. If anything, rural
25 parity with urban long distance customers won a lion’s share of congressional attention in the
26 1996 Act. Congress directed the FCC to “adopt rules to require that the rates charged by

1 providers of interexchange telecommunications services to subscribers in rural and high cost
2 areas shall be no higher than the rates charged by each provider to its subscribers in urban areas.”
3 47 U.S.C. § 254(g). This provision was designed “to incorporate the policies of geographic rate
4 averaging and rate integration of interexchange services” so that rural and high-cost subscribers
5 would be “able to continue to receive both intrastate and interstate interexchange services at rates
6 no higher than those paid by urban subscribers.” S. CONF. REP. NO. 230, *supra*, at 132.

7 Designation of a CETC therefore advances the public interest to the extent the
8 entrant can carry calls that an ILEC would treat as intraLATA or even interLATA long distance.
9 After all, a wireless carrier’s smallest “local” calling area is almost always larger than the local
10 area served by the wireline ILEC. See WWC Holding Co., Docket No. P-5695/M-98-1285, slip
11 op. at 6, 2000 WL 668286, at *4 (Minn. Pub. Utils. Comm’n, April 19, 2000). Providing deeper
12 geographic reach for the same local subscription rate delivers a significant benefit to the
13 consumer, and the FCC has cited analysts concluding that “wireless service is cheaper than
14 wireline, particularly if one is making a long distance call or when traveling.” *Implementation of*
15 *Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report & Analysis of*
16 *Competitive Market Conditions with Respect to Commercial Mobile Servs., Ninth Report*, 19
17 F.C.C.R. 20597, 20684, ¶214 (2004) (“*Ninth CMRS Competition Report*”). Each individual
18 consumer of telecommunications services, including low-income consumers and those living in
19 high-cost areas, benefits from a network that embraces the highest possible number of users,
20 regardless of the individual characteristics of any one consumer within the network.¹

21

22

23 ¹ See *TOPUC*, 183 F.3d at 406 n.2; Michael L. Katz & Carl Shapiro, *Systems Competition and Network*
24 *Effects*, 8 J. ECON. PERSPS. 93 (1994); Michael L. Katz & Carl Shapiro, *Technology Adoption in the Presence*
25 *of Network Externalities*, 94 J. POL. ECON. 822 (1986); Michael L. Katz & Carl Shapiro, *Network*
26 *Externalities, Competition, and Compatibility*, 75 AM. ECON. REV. 424 (1985); Eli M. Noam, *Will Universal*
Service and Common Carriage Survive the Telecommunications Act of 1996?, 97 COLUM. L. REV. 955, 958-
59 (1997); Jeffrey Rolfs, *A Theory of Interdependent Demand for a Communications Service*, 5 BELL J.
ECON. & MGMT. SCI. 16 (1974).

26

1 As matters stand, rural consumers do not enjoy parity with their urban
2 counterparts. The very reason high-cost support is needed is because it is very expensive to
3 provide service to rural areas. *See Alenco*, 201 F.3d at 617. The FCC has deemed it
4 “unreasonable to expect an unsupported carrier to enter a high-cost market and provide a service
5 that its competitor” — typically an incumbent — “already provides at a substantially supported
6 price.” *South Dakota Preemption Order*, 15 F.C.C.R. at 15,177; *see also Federal-State Joint*
7 *Board on Universal Service, Report and Order*, 12 F.C.C.R. at 8776, 8932 (1997) (“*First Report*
8 *and Order*”) (acknowledging that competition and affordable access to telecommunications
9 service in high-cost areas depends on competitive neutrality as between competitive entrants and
10 ILECs). For rural areas, the pro-competitive phenomenon of wireless-for-wireline substitution
11 relies on universal service support and the ETC designation process that controls access to
12 federal subsidies.

13 Although the federal universal service program may have reduced some of the
14 differences in service costs between rural and urban markets, urban consumers continue to enjoy
15 a choice of approximately two more competitors offering wireless carriage relative to their rural
16 counterparts. *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of*
17 *1993, Annual Report & Analysis of Competitive Market Conditions with Respect to Commercial*
18 *Mobile Servs., Tenth Report*, WT Docket No. 05-71, FCC 05-173, 2005 WL 2429714 at ¶94 (rel.
19 Sept. 30, 2005) (“*10th CMRS Competition Report*”). For those wireless carriers that do manage
20 to enter rural markets, the high cost of building network infrastructure in rural areas represents a
21 major obstacle to providing the same level of coverage and service quality that urban consumers
22 have come to take for granted. According to a study cited by the FCC, wireless customers in
23 rural areas report “significantly higher call quality problem rates” than those living in urban
24 areas, due to the relatively sparse distribution of wireless facilities in rural areas. *Id.* at ¶180.
25 The Commission in this proceeding should ensure that the progress toward reducing those
26

1 differences that was begun in Dockets UM 1083 and UM 1084 continues in Oregon by
2 developing competitively neutral ETC requirements in accordance with the 1996 Act.

3 **II. INITIAL DESIGNATION OF ETCS**

4 **A. WHAT SPECIFIC BASIC ELIGIBILITY REQUIREMENTS SHOULD THE 5 COMMISSION ADOPT FOR THE INITIAL CERTIFICATION OF ETCS?**

- 6 1. Should the Commission adopt any, or all, of the requirements proposed by the
7 FCC in Order 05-46 (“ETC Report and Order”)?

8 RCC and USCC recommend that the Commission adopt most of the FCC’s
9 requirements set forth in FCC Order 05-46. *See* Exhibits RCC-USCC/1 Wood/15-25 and
10 RCC/2, Kohler (Otto)/2-4. There appears to be general consensus among all the parties on this
11 issue. The one revision from the FCC’s proposed requirements is that RCC and USCC agree
12 with Staff’s version of the network improvement plan. *See* Exhibits RCC-USCC/4, Wood/20-25
13 and RCC/2, Kohler (Otto)/3. Staff describes its proposed revisions at Exhibits Staff/1,
14 Marinos/30-37 and Staff/4, Marinos/7-9. OTA also agrees with Staff’s position regarding the
15 “build out plan.” Exhibit OTA/5, Wolf/3. Qwest took limited positions on this issue and
16 appears also to be generally in agreement with Staff on this issue. Verizon’s position is
17 somewhat more equivocal. *See* Exhibit Verizon/2, Fulps/1 (compare lines 13 through 15 with
18 lines 21 through 23). If Verizon briefs a position in opposition to the apparent consensus among
19 the parties on this issue, RCC and USCC will respond on reply.

- 20 2. Should the Commission adopt other basic eligibility requirements?

21 RCC, USCC, and most of the other parties agree that the Commission does not
22 need to adopt any other basic eligibility requirements except those as set forth in the *ETC Report
23 and Order*. Exhibits RCC-USCC/1, Wood/25 and RCC/2, Kohler (Otto)/5. Staff recommended
24 seven additional basic eligibility requirements that are not set forth in the FCC’s order. Exhibit
25 Staff/1, Marinos/47-48. These additional requirements do not seem unduly burdensome to ETC
26 applicants and RCC and USCC do not oppose them.

1 OTA recommended that the Commission should also adopt quality of service
2 standards, drawing on existing PUC service quality rules. Exhibit OTA/1, Wolf/15. OTA did
3 not specify in its testimony which quality of service rules it would apply to competitive ETC
4 applicants. *Id.* However, through cross-examination and discovery, OTA identified a number of
5 OARs that it believes the PUC should apply. Exhibit RCC-USCC/10. Staff opposed OTA's
6 recommendation, noting:

7 The Commission should not adopt requirements for wireless carriers just because
8 they are imposed on wireline carriers. . . . OTA vaguely suggests that standards
9 for provisioning and held orders would be appropriate, but acknowledges that
standards related to customer access line testing, as well as to customer access
lines and wire center switching, would not be appropriate.

10 * * * *

11 OTA Direct Testimony notes that . . . the Commission is prohibited by Oregon
12 law from applying its service quality standards to cooperatives. Yet OTA fails to
13 recognize that the Commission is prohibited by Oregon law from applying the
service quality standards to wireless carriers as well.

14 * * * *

15 OTA's recommendation, assuming the Commission has the authority to
16 implement it, would require wireless carriers to construct new measurement
systems for each of the service quality standards that the Commission would
impose.

17 * * * *

18 This represents an unnecessary burden on wireless ETCs and would act as a
19 significant disincentive to wireless carriers to become ETCs.

20 * * * *

21 The approach taken by the Commission in Order No. 04-355 (page 9) in regard to
22 service quality standards and wireless ETCs is the correct one that should be
adopted in this docket.

23 Exhibit Staff/4, Marinos/12-14.

24 RCC and USCC agree with Staff. As Mr. Wood noted, OTA's proposal "appears
25 to be the kind of 'parity for parity's sake' that the Joint Board and FCC have recommended that
26 states not adopt." Exhibit RCC-USCC/4, Wood/33. The FCC has urged states to adopt

1 additional requirements such as service quality standards only if they are “necessary to further
2 universal service goals and do not serve to disadvantage an ETC simply because it is not an
3 ILEC.” *Id.* Mr. Wood noted that OTA’s testimony supported an exemption from the service
4 quality rules for cooperatives but failed to extend the same reasoning to wireless ETCs. *Id.*
5 Wood/34-35:

6 Customers exercise control over their service quality issues since those customers
7 can eliminate the CETC’s USF support by “voting with their feet” and obtaining
8 service from another provider. Like the management of an ILEC cooperative, the
management of a CETC is highly motivated to meet the customer’s quality of
service expectations.

9 *Id.*

10 Echoing one of Staff’s criticisms of OTA’s recommendation, Mr. Otto also
11 demonstrated the practical difficulties of complying with PUC quality of service rules enacted
12 primarily with ILECs in mind. Exhibit RCC/3, Otto/6-8. OTA’s cross-examination of Mr. Otto
13 seemed to suggest that some provisions of the OARs either fit or could be made to fit a wireless
14 carrier such as RCC. *See* Transcript at 16-24. If this argument is made by OTA, RCC and
15 USCC will address it more fully on reply. However, Mr. Otto has already noted the futility of
16 such an approach:

17 OTA’s recommendation is a classic example of the futility expressed by the old
18 “square peg in a round hole” axiom. The rules don’t fit wireless technology. As
19 Mr. Wood testifies, public policy does not require such rules. Finally, if they
20 were somehow made to fit, the cost of compliance would be enormous. ***The
money would be better spent adding cell sites, upgrading networks, and taking
other steps to continue to improve wireless service.***

21 *Id.* Otto/8 (emphasis added). Staff, RCC, and USCC agree that there is no need for imposition of
22 some or all of the PUC’s existing service quality rules on CETCs.

23 3. Should the same requirements apply to applications for designations in rural and
24 non-rural ILEC service areas?

25 RCC and USCC do not believe that a public interest determination is required for
26 designation of an ETC in areas served by a non-rural telephone company. Exhibit RCC-
USCC/1, Wood/25. Indeed, immediately after passage of the 1996 Act, the FCC so held. *See*

1 *First Report and Order, supra*, 12 F.C.C.R. at 8852 (“[T]he discretion afforded a state
2 commission under section 214(e)(2) is the discretion to decline to designate more than one
3 eligible carrier in an area that is served by a rural telephone company; in that context, the state
4 commission must determine whether the designation of an additional eligible carrier is in the
5 public interest.”) Recently, and without sufficient explanation, the FCC reversed course and
6 applied a public interest test to areas served by non-rural telephone companies.² *See Federal-*
7 *State Joint Board on Universal Service, Report and Order*, 20 FCC Rcd 6371, 6390 (2005)
8 (“*ETC Report and Order*”). *See also Virginia Cellular, LLC*, 19 F.C.C.R. 1563, 1575 (2004)
9 (“*Virginia Cellular*”). This apparent about face appears inconsistent with the plain language of
10 Section 214 of the Communications Act. However, given the recent FCC decision and the fact
11 that RCC and USCC have already been designated as ETCs, they do not object to the
12 Commission applying a public interest test to designations in both rural and non-rural service
13 areas for the time being. Such a requirement should be revisited, however, should the FCC
14 change or clarify its approach in the future, or if the FCC’s latest views do not survive review.

15 4. Should the same requirements apply regardless of the type of support (traditional
16 high-cost, interstate access/common line, low-income) that the ETC will receive?

17 RCC and USCC agree that the same requirements for ETC designation should
18 apply regardless of the type of support that the ETC will receive, with one exception. RCC-
19 USCC/1, Wood/26. The exception would be that applicants requesting only low-income support
20 (Lifeline and Link-Up) should not need to provide a network build-out plan. The reason for the
21 exception is that such applicants will not be receiving support for building and maintaining a
22 network, only for subsidizing the services of low-income customers. Accordingly, the build-out
23 plan is not applicable to such applicants. There appears to be a general consensus among the
24 parties on this issue. *See, e.g.*, Exhibit Staff/1, Marinos/53; OTA/1, Wolf/16; Verizon/1, Fulp/5.

25 ² The Commission limited the test to a statement that if a carrier demonstrates that it is in the public
26 interest to be designated in an area served by a rural carrier, that is sufficient to demonstrate that it is in
the public interest to designate in areas served by a non-rural carrier.

1 **B. WHAT SPECIFIC CRITERIA SHOULD THE COMMISSION ADOPT TO**
2 **DETERMINE WHETHER DESIGNATION OF A COMPETITIVE ETC IS IN**
3 **THE PUBLIC INTEREST, AS REQUIRED BY SECTION 214(E)(2) OF THE**
4 **TELECOM ACT?**

- 5 1. Should the Commission adopt the criteria proposed by the FCC in the *ETC Report*
6 *and Order*?

7 The parties are mostly in agreement that the Commission should adopt the public
8 interest criteria used by the FCC in its *ETC Report and Order*. See, e.g., Exhibits RCC-USCC/1,
9 Wood/26; Staff/1, Marinos/55-56; OTA/1, Wolf/16-17; and Verizon/2, Fulp/2. There are a
10 couple of exceptions to note, however. First, OTA advocates an analysis of the impact of
11 designation of an additional ETC on the size of the federal USF. Exhibit OTA/1, Wolf/18-19.
12 RCC and USCC, as well as the Staff, disagree.³ See Staff/4, Marinos/20.

13 The solution to the size of the fund, if it is a problem, is best left to be resolved at
14 a national level. OTA's anti-competitive and self-serving recommendation focuses exclusively
15 on only one minor component of the fund and ignores other factors that have significantly
16 contributed to the size of the fund. As Mr. Wood's testimony points out, OTA's witness omitted
17 any discussion of other factors that have an even greater impact on the size of the USF and the
18 designation of a single additional ETC. For example:

19 The ongoing transition from implicit to explicit support has had a significant
20 impact, as did the FCC's decision to grant the rule ILECs' request to base a high-
21 cost support on a modified embedded cost mechanism. In addition, a decision to
22 continue to support a higher-cost ILEC ETC, in an area that is completely served
23 by a lower cost CETC, significantly inflates the size of the fund while providing
24 no clear public benefit.

25 Exhibit RCC-USCC/4, Wood/35-36. As Staff points out:

26 Designation of any individual ETC is unlikely to have a significant impact on the
federal universal service fund, given its current size. The FCC admits as much in
paragraph 54 of its Order 05-46.

³ Qwest and Verizon did not address this point.

1 Staff/4, Marinos/20. Indeed, the FCC has never denied the designation of an additional ETC
2 based on this purported consideration.

3 Oregon should not deny itself the benefits of additional high-cost support because of the
4 negligible impact that designation of an additional ETC in Oregon would have on the size of the
5 fund. Staff agrees with this analysis:

6 [T]he Commission should consider each application based on the benefits that the
7 specific carrier's designation would produce for Oregon customers, not on the
8 impact it would have on a universal service fund.

8 Exhibit Staff/4, Marinos/20.

9 The other significant area where the parties diverge regarding the FCC's proposed
10 public interest criteria is OTA's recommendation that a "cream skimming test" be required in
11 rural ILEC areas. RCC and USCC agree with Staff's recommendation that the Commission
12 dispense with a "cream-skimming" test as a public interest criterion in the designation of CETCs.
13 See Staff/1, Marinos/62 and Staf/4, Marinos/19-20. This issue is closely intertwined with the
14 issue of disaggregation of support to the wireline level, which is discussed in Section II.B.4,
15 below. Regardless of whether the Commission requires ILECs to further disaggregate their
16 support, however, the cream skimming test is not necessary to protect the public interest. As Mr.
17 Wood noted, OTA's "cream skimming" argument lacks any hard evidence to support it and is
18 contrary to rational business behavior.

19 While I have reviewed numerous claims of "cream skimming" by ILECs in many
20 different contexts, I have yet to see a demonstration of an actual attempt by a
21 competing carrier to engage in such a strategy. In the current context . . . any
22 attempt to engage in so-called "cream skimming" would represent a very poor
23 business plan for any carrier. As a practical matter, even a carrier that diverts its
24 considerable resources away from its business operation in order to attempt to
25 exploit opportunities for geographic "cream skimming" would find it almost
26 impossible to successfully accomplish this objective.

* * * *

24 My review of hundreds of network cost studies reveals an inescapable truth: It is
25 impossible to conclude that network costs vary based on any set of broad criteria.
26 Costs vary on a very discreet geographic scale, making it difficult (if not

1 impossible) to identify individual customers that are “low cost” and thereby
2 represent a “cream skimming” opportunity.

3 Exhibit RCC-USCC/1, Wood/30.

4 Moreover, RCC and USCC obtained significant evidence in this docket to debunk
5 OTA’s “cream skimming” boogey man. In response to data requests, OTA was not able to
6 provide a single example of cream skimming. Exhibit RCC-USCC/4, Wood/39-40. From other
7 data OTA provided, Mr. Wood prepared an analysis that showed a very low correlation between
8 the factors related to the FCC’s cream skimming analysis that OTA advocates. *Id.*, Wood/40-42.
9 Staff concurs in this analysis, stating:

10 Mr. Wood provided a regression analysis based on a cost study performed by Citizens
11 Telecommunications Company that was produced in a discovery response by OTA to
12 RCC and USCC. The regression analysis showed that in the wire centers studied only
13 about 40% of the variation in total cost can be explained by differences in line density.
14 Thus, even assuming that population density corresponds to line density, the FCC’s
15 cream skimming analysis is really of very little use, particularly considering that no
16 examples of cream skimming can be documented by OTA. The Commission Staff
17 witness agreed with RCC and USCC.

18 *See* Staff/4, Marinos/19-20. The cream skimming analysis is neither necessary nor useful.

19 2. Should the criteria differ between designations in rural and non-rural ILEC
20 service areas?

21 As explained in the Staff’s Reply testimony, the dispute between the parties
22 relating to cream skimming is equally relevant to both Issue II.B.1. and II.B.2. The two issues
23 are, therefore, discussed together in this brief under Issue II.B.1. *See also*, Staff/4, Marinos/19.

24 3. Should the Commission require an ETC to include entire ILEC wire centers in its
25 service area, regardless of the boundaries of its licensed area?

26 The parties appear to be in relative agreement that an ETC should include entire
ILEC wire centers in its ETC service area, provided that applicants for ETC designation will be
afforded an opportunity to “demonstrate how granting an exception would serve the public
interest in that specific instance.” Staff/4, Marinos/21, *see also*, TR at 155. RCC and USCC
concur in this recommendation. Staff recommends that this rule apply equally in both rural and
non-rural ILEC territories. There is one important caveat to Staff’s recommendation, however.

1 The Commission has previously defined certain ETC service areas, including those of RCC and
2 USCC, to include partial wire centers in non-rural ILEC territories. Staff has expressly
3 recognized this fact and has clarified that, if the Commission accepts its recommendation, it
4 would not apply the new requirement retroactively. TR at 154. Retroactive application of this
5 rule would significantly disrupt RCC and USCC operations within Oregon where they have
6 already made investments and are currently offering and advertising the availability of their
7 services, including Lifeline and Link-up services. With that understanding of Staff's
8 recommendation, RCC and USCC agree with Staff's proposal.

9 4. Whether and to what extent the Commission should require incumbent local
10 exchange carriers to disaggregate and target support in a different manner, as
11 permitted by 47 C.F.R. § 54.315(c)(5).

12 RCC and USCC strongly support Staff's recommendation that the Commission
13 require the rural ILECs in Oregon to disaggregate their support on a wire center basis. *See*
14 Staff/1, Marinos/69. As Staff explains:

15 To the extent that disaggregation of support results in per-line support amounts
16 that more closely reflect the costs of serving each individual wire center, it sends
17 the correct economic signals to encourage CETCs to expand into higher cost
18 areas in order to obtain the higher support amounts. Per-line support based on
19 averages sends the wrong signals to CETCs, encouraging them to serve the lower
20 cost areas where support payments exceed costs, and discouraging them from
21 serving the higher cost areas where support is below cost.

22 Staff/1, Marinos/67-68. In other words, disaggregation provides the proper incentive to move
23 universal service support to the highest cost wire centers where the subsidy is needed the most.

24 Mr. Wood succinctly summarizes this point, stating:

25 Matching the level of per-line support with cost will also permit the USF
26 program to have the maximum beneficial impact on those customers who live or
work in high cost areas because high-cost support will not be available to carriers
for serving low-cost areas, but instead will be targeted to the high-cost areas
where it is needed most.

RCC-USCC/1, Wood/38.

1 As mentioned above, Staff's disaggregation proposal is closely tied to its
2 recommendation regarding the "creamskimming" test. As Mr. Wood explains:

3 To the extent that the Commission has concerns about "creamskimming," it
4 should adopt disaggregation of support at the wire center level as the most direct
5 and effective method to prevent "creamskimming" even as a theoretical
6 possibility. Requiring the ILECs to target support "at the wire center level based
7 on relative cost" will "significantly reduce the possibility that carriers would
8 receive a windfall from support for that wire center" and make "creamskimming"
9 a non-issue.

10 RCC-USCC/1, Wood/36. This effect is exactly what the FCC found to be true in determining
11 that "a creamskimming analysis is unnecessary for ETC applicants seeking designation below
12 the service area level of non-rural incumbent LECs." *ETC Report and Order*, 20 F.C.C.R. at
13 6394, ¶52.

14 Staff clearly recognizes that the rural ILECs oppose disaggregation precisely
15 because it provides an argument for excluding CETC entry based on the notion of
16 creamskimming.

17 It appears that under current conditions, ILECs have no incentive to disaggregate
18 support on their own without Commission directives to do so. Further, the
19 creamskimming test gives rural ILECs an additional reason to retain averaged
20 support amounts because it prohibits CETCs from being designated in many rural
21 areas.

22 Staff/1, Marinos/69. The Commission should not permit this ruse to continue. Rather
23 than leaving in place an artificial construct that serves to ban competitive ETC entry into
24 high cost areas, the Commission should direct the rural ILECs to disaggregate so that
25 support flows to the high cost wire centers, promoting subsidized competitive entry only
26 where it is most needed.

1 While the rural ILECs' real reason for opposing disaggregation is quite
2 obvious, in this proceeding OTA expressly opposes Staff's disaggregation
3 recommendation based on the notion that the cost to rural ILECs of preparing
4 disaggregation studies outweighs the benefits of disaggregation. OTA/7, Mason/2. This
5 position is simply not supported by the record. As described above, the benefits
6 associated with disaggregation are substantial in that high cost support is targeted to the
7 highest cost wire centers to the benefit of consumers. This, in turn, sends the proper
8 economic signals to carriers, ensuring that the benefits of competition are realized by
9 those consumers in the most remote areas of the state. The cost of performing
10 disaggregation studies based on relative cost differences between wire centers, on the
11 other hand, is relatively inexpensive. As Mr. Wood explains, he prepared a
12 representative disaggregation study in approximately two hours, using an Excel
13 spreadsheet and relative cost factors derived from existing cost proxy model results.
14 RCC-USCC/4, Wood/47. OTA, on the other hand, could provide no quantification of
15 the costs of preparing disaggregation. *Id.*

18 When asked in discovery to describe the benefits and costs that the
19 Commission should consider in performing such an analysis, OTA could not even bring
20 itself to recognize the benefits of disaggregation to consumers. Instead, OTA's discovery
21 response claims that such a benefit is "debatable" and focuses instead on the "benefits to
22 consulting and legal firms associated with completing and filing a disaggregation study."
23 RCC-USCC/16. This response shows the degree to which OTA's stated opposition to
24 disaggregation in this proceeding is disingenuous. Contrary to OTA's baseless claims,
25
26

1 the record demonstrates that the benefits of disaggregation are significant while the costs
2 of disaggregation are relatively insignificant.

3

4 5. Should the Commission adopt an upper limit on the number of ETCs that can be
5 designated in any given area? Any party proposing adoption of an upper limit
6 should explain its proposal in detail, including the legal basis for its position.

7 RCC and USCC agree with Staff that there should be no upper limit on the
8 number of ETCs that can be designated in a given area. This issue is closely related to the OTA
9 recommendation discussed above under Issue II.B.1. and 2. that the impact of an ETC
10 designation on the size of the fund should be considered as part of the public interest test. As
11 described in detail above, the presumption that an individual ETC designation will significantly
12 impact the fund is simply unfounded. *See* Staff/4, Marinos/20. As Staff succinctly observes,
13 neither Verizon nor OTA have

14 sufficiently demonstrate[d] how imposing such limits would serve the interests of
15 telecommunications consumers in Oregon better than permitting the designation
16 of multiple ETCs that meet the statutory requirements for eligibility. Staff agrees
17 with RCC and USCC that a cap on the number of ETCs could limit competitive
18 entry that would benefit end user customers. *See* Exhibit RCC-USCC/1,
19 Wood/39-40.

20 Staff/4, Marinos/25.

21 As Mr. Wood demonstrates in his testimony, the number of ETCs in any given
22 area is already capped by economic forces. As Mr. Wood explains:

23 The first carrier seeking ETC designation may find that entry into the area makes
24 good business sense, but the next carrier (as a potential ETC) is less likely to find
25 the area economically viable. The viability diminishes quickly in high-cost areas
26 where there may be on a few customers to capture – thus minimizing the
availability of high-cost support in those areas. Because the likelihood that a
given carrier will seek designation diminishes as additional ETCs are designated,
the market can be expected to limit the number of ETCs to the number that can
be viable given the rural ILEC's cost structure.

1 RCC-USCC/1, Wood/39. Placing an artificial cap on the number of ETCs is, therefore,
2 duplicative, unnecessary and anti-competitive. The Commission should adopt Staff's
3 recommendation.

4
5 **III. ANNUAL CERTIFICATION OF ETCS**

6 **A. WHAT SPECIFIC REQUIREMENTS SHOULD THE COMMISSION ADOPT
FOR THE ANNUAL RECERTIFICATION OF ETCS?**

7 1. Should the Commission adopt any, or all, of the FCC reporting requirements
8 proposed in the *ETC Report and Order*?

9 RCC and USCC agree that the Commission should adopt the FCC's reporting
10 requirements set forth in *ETC Report and Order* for *all* ETCs, with one modification and some
11 clarification. The modification is that the progress report on the five-year service improvement
12 plan should be modified consistent with the Staff's recommended revision to two-year plan. *See*
13 Exhibits RCC-USCC/1, Wood/40-41; Staff/1, Marinos/83. There is general consensus in this
14 docket on adopting the FCC requirements with this modification for CETCs. *E.g., Exhibits*
15 OTA/1, Wolf/25-26; Verizon/1, Fulp/9-10. Some parties, however, do not agree that the same
16 reporting requirements should be applied to ILECs. This parity issue is discussed below.

17 As to CETC annual reporting, there is also consensus on the clarifications of the
18 reporting requirements. Foremost, the FCC's order did not define what constitutes a "complaint"
19 for purposes of complaint reporting. As RCC explained, the FCC only interprets a "complaint"
20 to encompass a formal or informal complaint to the FCC or a state commission. The Staff
21 viewed such an interpretation as too narrow and initially sought a report that "quantifies
22 consumer complaints for the previous year, by type and by switch." Exhibit Staff/1, Marinos/81-
23 82. As RCC's witness explained, however, there are many difficulties in determining which of
24 the thousands of calls that RCC's customer service center receives constitutes a "complaint" and
25 therefore must be tracked and reported. *See generally*, Exhibit RCC/2, Kohler (Otto)/6-9. In
26

1 response to this testimony⁴ a compromise was reached. This is reflected in Staff's Rebuttal

2 Testimony which states:

3 After considering RCC's testimony regarding the filing of customer complaint
4 reports, I recommend that instead of "complaint reports," all ETCs should file
"trouble reports."

5 . . .

6 RCC witness [Otto] suggests . . . that RCC could file an annual trouble report
7 "that lists every trouble call to a call center based on the telephone number of the
8 originating call to the call center." . . . I suggest four categories: no service,
network busy, interruption of service (including dropped calls), and poor
9 reception. The wireless ETC should report using these or similar categories. . . .
The report should be Oregon-specific and by wireless switch location.

10 Exhibit Staff/4, Marinos/31-33 (emphasis added). As modified in rebuttal, RCC and USCC
11 concur with the Staff recommendation. RCC and USCC will be able to extract reports from its
12 trouble ticket system and manually categorize them into the suggested categories or similar
13 categories. See Exhibit RCC/3, Otto/4-5. The revised Staff recommendation is in essence the
14 procedure RCC followed last year with its 2005 annual report regarding complaints. *Id.*
15 Additionally, Staff recommends that wireless ETCs report troubles per 100 Oregon customer
16 handsets (compared to 1,000 as established by the FCC). Exhibit Staff/4, Marinos/33-34. RCC
17 and USCC do not object to this additional requirement.

18 Thus, as clarified and slightly modified,⁵ and consistent with Staff's final
19 recommendations in this docket, RCC and USCC support adopting the FCC's reporting
20 requirements set forth in the *ETC Report and Order*.

21 2. Should the Commission adopt other reporting requirements?

22 The parties appear to be in agreement on the additional reporting requirements
23 that should apply to the annual recertification process. Staff recommends that the nine reporting
24 requirements set forth in the Commission's RCC and USCC ETC designation orders (Order Nos.

25 ⁴ and pursuant to informal discussions among Staff, RCC, and USCC off the record.

26 ⁵ and subject to the proviso that ILECs should be required to report the same information.

1 04-355 and 04-356) should continue to apply. Staff/1, Marinos/85-86. As Staff witness Marinos
2 explains, seven of these nine requirements are similar to the FCC proposed requirements. She
3 recommends continuation of the other two requirements (documentation that the carrier has
4 advertised the supported services throughout the designated service area, and reports regarding
5 progress on any special commitments related to the initial ETC designation). Staff/1,
6 Marinos/86. RCC and USCC agree with Staff's recommendation, provided that these same
7 conditions be applied to the annual recertification reporting requirements of all ETCs, including
8 the rural ILECs.

9 3. Should the same reporting requirements apply to all types of ETCs – ILEC ETCs
10 and competitive ETCs?

11 RCC and USCC recommend that the Commission apply the same annual
12 recertification reporting requirements to all ETCs, including the ILECs. Put simply, all carriers
13 should be required to provide some reasonable information concerning specific projects
14 undertaken with support to benefit consumers. As Mr. Wood explains,

15 The Commission's ability to monitor whether any ETC (ILEC or CETC)
16 continues to comply "with the conditions of the ETC designation and that
17 universal service funds are used for their intended purpose" depends on the
18 information in these annual filings. Both ILECs and CETCs should be required
19 to provide the same information as part of the recertification process.

20 RCC-USCC/1, Wood/42. Contrary to Staff and OTA assertions, the fact that ILEC ETCs, as
21 former monopoly providers, file a series reports with the Commission, does not mean that the
22 ILECs should be excused from providing the information necessary for the Commission to
23 certify their compliance with the requirements that are imposed on those carriers as ETCs. The
24 FCC has recognized this need and has urged state regulators to apply the recertification reporting
25 requirements to both CETCs and ILEC ETCs, stating:
26

1 [W]e encourage state commissions to adopt these annual reporting requirements.
2 To the extent that they do so, we urge state commissions to apply the reporting
3 requirements to all ETCs, not just competitive ETCs.

4 *ETC Report and Order*, 20 FCC Rcd at 6402, ¶71.

5 The reports provided by ILECs for other purposes do not include the information
6 that is directly relevant to the ETC recertification process, namely, “how the ETC actually used
7 the support money it received during the past year.” *See* Staff/1, Marinos/58. Verizon was
8 candid enough to admit that the PUC’s Form O that it files “was not designed to provide”
9 information about “how much universal service support was received and how the support was
10 used to improve service quality, coverage, or capacity.” Exhibit RCC/7.

11 OTA points to Form I as the basis for claiming that the ILECs already provide
12 the information needed for the annual ETC recertification process. While Form I provides an
13 accounting of ILEC expenditures and a line item indicating the amount of USF support received,
14 it does not “connect the dots” between the two. As Mr. Wood notes, Form I:

15 . . . does not require the ILEC ETC to show how the identified federal USF
16 support was used only for the “provision, maintenance, and upgrading” of
17 facilities for which the support is intended. The information provided to the
18 Commission on Form I, like the information provided to the FCC through
19 NECA, does not provide an upfront accounting of how the funds are going to be
used, but simply confirms that a given level of total cost was incurred.

20 RCC-USCC/4, Wood/59.

21 Not only does the Commission does not get detailed information about use of
22 USF from ILECs, ILECs are seldom subject to any additional scrutiny by the Commission, for
23 example, as in a rate case⁶⁶. Verizon’s last rate case was in 1998. Transcript at 76. Its authorized
24

25 ⁶⁶ Indeed, the Commission cannot even conduct a rate case against cooperatives, which limits the PUC’s
26 ability to monitor their use of USF. *E.g.* Transcript at 165-66 (Marinos).

1 rate of return was set then at 9.69%. *Id.* Yet, in 2004, Verizon earned a healthy Oregon return
2 of 16%. Exhibit RCC/22 at 84. Other ILECs earned as much as 25.2% (Trans Cascade), 29.8%
3 (Asotin), and 29.9% (Mt. Angel). *Id.* at 76-80. USF receipts are included in these calculations
4 of earnings. *See Id.* Based on the reports the PUC currently receives there is no way to know
5 whether the USF component of such generous earnings is being used for the provision,
6 maintenance, or upgrading of supported services, to pay dividends to shareholders and members,
7 or to pay for unsupported services, such as DSL.

9 For these reasons, the Commission must require the ILECs to provide the same
10 annual reporting information that it requires of CETCs. Otherwise, it will not be in a position to
11 certify to the FCC that the ILEC ETC has actually complied with its USF obligations.

12
13 4. Should the same reporting requirements apply regardless of the type of support
14 (traditional high-cost, interstate access/common line, low-income) received by the
15 ETC?

16 RCC and USCC believe the same reporting requirements should apply regardless
17 of the type of support received by an ETC. An ETC should not be eligible for recertification
18 unless it can demonstrate that it has complied with the applicable requirements regarding
19 operation as an ETC and that all funds it has received have been used for the intended purposes.
20 *See, e.g.,* Exhibit RCC-USCC/1, Wood/42. Only ETCs that do not receive any high-cost funds,
21 such as the ETCs that have been designated only to receive Lifeline and Link-Up support, might
22 require less extensive reporting. *Id.*

23 ILECs have argued in this docket that if they only receive access-related support
24 (IAS and ICLS), they should not be subject to the full annual reporting requirements. RCC and
25 USCC does not agree with this and instead support the Staff's position. As Ms. Marinos noted:

26 The Commission has an ongoing responsibility to ensure that every ETC that it
has designated continues to fulfill its universal service responsibilities, regardless
of the type of support received . . . [w]ithout periodic reporting, there is . . . no

1 mechanism to ensure that . . . an ETC is meeting its overall universal service
2 responsibilities. . . . For these reasons, the Commission should not relieve ETCs
3 from reporting responsibilities based purely on the type of universal service
4 support they receive, even if the ETC is self-certified directly to the FCC. All
5 ETCs should be subject to annual reporting requirements in order to continue
6 receiving federal universal service support.

7 Exhibit Staff/1, Marinos/92-93.

8 In her rebuttal testimony, Ms. Marinos agreed with RCC and USCC's position
9 regarding annual reporting requirements being the same regardless of the type of support
10 received. Exhibit Staff/4, Marinos/43. Ms. Marinos countered the arguments of ILECs that they
11 should "be held less accountable for access-related support" than for high-cost support. As she
12 pointed out, access-related support (IAS and ICLS) comprised over half—55%—of the total
13 high-cost support for Oregon ETCs in the fourth quarter of 2005. *Id.*, Marinos/44. Further, the
14 Staff noted that the FCC has few "if any" checks on carriers who receive access-related support,
15 while the Oregon Commission has a responsibility to ensure that Oregon consumers receive the
16 maximum benefits of the USF. *Id.*

17 RCC and USCC reject the notion that access-related support is merely "revenue
18 replacement". In fact, IAS and ICLS are "high-cost" support. They represent that portion of
19 carrier access charges that used to be implicit universal service subsidies. Those amounts are no
20 longer within carrier rates, but are exposed to the light of day in an explicit universal service
21 program, as mandated by the 1996 Act. Any carrier receiving high-cost support of any kind
22 must account for its use by demonstrating that it is being re-invested into a carrier's network or
23 used to reduce customer charges. After all, that is the law Congress wrote.⁷

24 _____
25 ⁷ See 47 U.S.C. Section 254(e), which provides in pertinent part: "A carrier that receives such support
26 shall use that support only for the provision, maintenance, and upgrading of facilities and services for
which the support is intended."

1 CONCLUSION

2 RCC and USCC urge the Commission to adopt by order non-discriminatory ETC
3 certification and annual reporting requirements consistent with the foregoing discussion and the
4 prefiled testimonies of Messrs. Otto and Wood.

5 DATED this 17th day of April, 2006.

6 MILLER NASH LLP

7 Brooks E. Harlow by MPT
8 Brooks E. Harlow
9 OSB No. 03042

10 Attorneys for RCC Minnesota, Inc.

11 DAVIS WRIGHT TREMAINE

12 Mark P. Trincherro
13 Mark P. Trincherro
14 OSB No. 88322

15 Attorneys for U. S. Cellular Corp.

CERTIFICATE OF SERVICE

UM 1217

I hereby certify on this 17th day of April, 2006, the Opening Brief of RCC and USCC was filed electronically and will be sent via UPS overnight mail to the Oregon Public Utility Commission.

Also, a copy of the filing was sent electronically to the service list which is attached.

DAVIS WRIGHT TREMAINE LLP

By: Barbara Lasswell
Barbara Lasswell for Mark P. Trincherro



[Text-Only Site](#)

[State Directory](#)

[Agencies A-Z](#)

[Accessibility](#)

[SEARCH](#)



[Business](#)

[Education](#)

[Human Services](#)

[Natural Resources](#)

[Public Safety](#)

[Recreation](#)

Public Utility Commission

eDockets

Docket Summary

Docket No: UM 1217

Docket Name: TELCO CARRIERS ELIGIBLE FOR FEDERAL UNIVERSAL SERVICE SUPPORT

[Print Sum](#)

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Investigation to Establish Requirements for Initial De and Recertification of Telecommunications Carriers Eligible to Receive Federal Universal Service Support. (Staff report

Filing Date: 8/16/2005

Case Manager: KAY MARINOS

Phone: (503) 378-6730

Email: kay.marinos@state.or.us

Law Judge: MICHAEL GRANT

Phone: (503) 378-6102

[Email Service List \(semi-colon delimited\)](#)

[Email Service List \(comma de](#)

ACTIONS		SERVICE LIST (Parties)	SCHEDULE
W=Waive Paper service	Q=Confidential	<u>Sort by Last Name</u>	<u>Sort by Company Name</u>
AT&T WIRELESS SERVICES			
	CINDY MANHEIM	16331 NE 72ND WAY RTC1 REDMOND WA 98052 cindy.manheim@cingular.com	
CITIZENS' UTILITY BOARD OF OREGON			
	JEFF BISSONNETTE	610 SW BROADWAY STE 308 PORTLAND OR 97205-3404 jeff@oregoncub.org	
	JASON EISDORFER	610 SW BROADWAY STE 308 PORTLAND OR 97205 dockets@oregoncub.org	
DAVIS WRIGHT TREMAINE			
	SARAH K WALLACE (Q) ATTORNEY AT LAW	1300 SW FIFTH AVENUE SUITE 2300 PORTLAND OR 97201 sarahwallace@dwt.com	
DAVIS WRIGHT TREMAINE LLP			
	MARK P TRINCHERO (Q)	1300 SW FIFTH AVE STE 2300 PORTLAND OR 97201-5682 marktrinchero@dwt.com	
DEPARTMENT OF JUSTICE			
	MICHAEL T WEIRICH (Q) ASSISTANT ATTORNEY GENERAL	REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us	

EDGE WIRELESS, LLC

KEVIN KEILLOR

650 SW COLUMBIA - STE 7200
BEND OR 97702
kjkellor@edgewireless.com

ELECTRIC LIGHTWAVE LLC

CHARLES L BEST
ATTORNEY AT LAW

PO BOX 8905
VANCOUVER WA 98668-8905
charles_best@eli.net

FRONTIER COMMUNICATIONS OF AMERICA INC

INGO HENNINGSSEN

3 TRIAD CTR STE 160
SALT LAKE CITY UT 84180
ingo.henningsen@czn.com

GVNW CONSULTING INC

JEFFRY H SMITH (Q)
CONSULTING MANAGER

PO BOX 2330
TUALATIN OR 97062
jsmith@gvnw.com

LAW OFFICE OF RICHARD A FINNIGAN

RICHARD A FINNIGAN (Q)
ATTORNEY AT LAW

2112 BLACK LAKE BLVD SW
OLYMPIA WA 98512
rickfinn@localaccess.com

MALHEUR HOME TELEPHONE CO

JAMES TODD (Q)
CORPORATE PRESIDENT

PO BOX 249
ONTARIO OR 97914
jimmy.todd@qwest.com

MILLER NASH LLP

BROOKS HARLOW (Q)
ATTORNEY

601 UNION ST STE 4400
SEATTLE WA 98101-2352
brooks.harlow@millernash.com

OREGON TELECOMMUNICATIONS ASSN

BRANT WOLF (Q)
EXECUTIVE VICE PRESIDENT

707 13TH ST SE STE 280
SALEM OR 97301-4036
bwolf@ota-telecom.org

PUBLIC UTILITY COMMISSION OF OREGON

KAY MARINOS

PO BOX 2148
SALEM OR 97308-2148
kay.marininos@state.or.us

QWEST CORPORATION

ALEX M DUARTE (Q)
CORPORATE COUNSEL

421 SW OAK ST STE 810
PORTLAND OR 97204
alex.duarte@qwest.com

SPRINT COMMUNICATIONS CO LP

BARBARA YOUNG
GOVERNMENT AFFAIRS MANAGER

902 WASCO ST - ORHDRA0412
HOOD RIVER OR 97031-3105
barbara.c.young@mail.sprint.com

SPRINT/UNITED TELEPHONE CO OF THE NORTHWEST

WILLIAM E HENDRICKS (Q)
ATTORNEY

902 WASCO ST A0412
HOOD RIVER OR 97031

tre.e.hendricks.iii@sprint.com

STOEL RIVES LLP

TIMOTHY J O'CONNELL (Q)

ONE UNION SQUARE
600 UNIVERSITY ST STE 3600
SEATTLE WA 98101-3197
tjoconnell@stoel.com

VCI COMPANY

STACEY A KLINZMAN
DIRECTOR - REGULATORY
COMPLIANCE

3875 STEILACOOM BLVD SW #A
LAKEWOOD WA 98499
staceyk@vcicompany.com

VERIZON NORTHWEST INC

SHELLY JENSEN (Q)
MANAGER REGULATORY & GOVT
AFFAIRS

PO BOX 1100
BEAVERTON OR 97075
schelly.jensen@verizon.com

WANTEL INC

MARTY PATROVSKY (Q)
CONSULTANT - LIAISON OFFICER

1016 SE OAK AVE
ROSEBURG OR 97470
marty.patrovsky@comspanusa.net

[Text Only](#) | [State Directory](#) | [A-Z Listing](#) | [About Oregon.gov](#) |
[Site Map](#) | [File Formats](#) | [OAR](#) | [ORS](#) | [Privacy Policy](#) | [Website Feedback](#)