

HOLBROOK & SEIFERT LLC  
Attorneys at Law

P.O. Box 2087 Newport OR 97365

Phone (541) 265-2080 Fax (541) 265-2131

Douglas R. Holbrook

Ronald H. Seifert

August 24, 2010

Public Utility Commission for Oregon  
Attn: Filing Center  
PO Box 2148  
Salem OR 97308-2148

RE: UM 1484 CenturyLink/Qwest - Parker Telecommunications Testimony

Dear Filing Center:


I enclose the original and five copies of testimony being submitted in this matter on behalf of Parker Telecommunications.

The testimony enclosed is as follows:

<u>Exhibit</u>	<u>Witness</u>
100	Edward Parker, Parker Telecommunications, Intervenor
200	Jerry Palmer, Lt. Lincoln City Police and 911 manager
300	David Hawker, Lincoln City Manager
400	Gordon McCraw, Tillamook County Emergency Manager
500	Dennis Manning

Thank you for your attention. If you have any questions or concerns, please feel free to contact me.

Sincerely,



Douglas R. Holbrook

cc: Service List

[100824 ltr to PUC.wpd]

CASE: UM 1484  
WITNESS: Edwin B. Parker

PUBLIC UTILITY COMMISSION  
OF  
OREGON

PARKER TELECOMMUNICATIONS EXHIBIT 100

In the Matter of	)	
CENTURYLINK, INC.	)	Edwin B. Parker's Direct
	)	Testimony in Support of Parker
Application for merger between CenturyTel,	)	Telecommunications Proposed
Inc. and Qwest Communications International,	)	Conditions
Inc.	)	

August 24, 2010

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION?**

2 A. My name is Edwin B. Parker and my business mailing address is PO Box 402, Gleneden  
3 Beach, OR 97388. The street address is 29 Aster Lane, Gleneden Beach, OR 97388. I  
4 am President of Parker Telecommunications, a small telecommunications policy  
5 consulting business.

6 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**  
7 **PROFESSIONAL EXPERIENCE?**

8 A. I received a B.A. degree from the University of British Columbia in 1954, an M.A. degree  
9 from Stanford University in 1958 and a Ph.D. in Communication from Stanford  
10 University in 1960. I was a professor at the University of Illinois from 1960-1962 and a  
11 professor of Communication at Stanford University from 1962-1979, where I specialized  
12 in the social and economic effects of information technology. From 1979-1987, I was co-  
13 founder and later President, Board Chairman and Chief Executive Officer of Equatorial  
14 Communications, a publicly traded competitive telecommunications company. From  
15 1987-1988 I was President of the Data Networks Division of a subsidiary of an  
16 Incumbent Local Exchange Carrier, Contel, that had had acquired Equatorial before  
17 Contel merged with GTE and GTE merged with Verizon. Since 1989 I have been  
18 president of Parker Telecommunications. I am co-author of several books, including  
19 *Electronic Byways: State Policies for Rural Development through Telecommunications*. I  
20 served on the Connecting Oregon Communities Advisory Board and the Oregon  
21 Telecommunications Coordinating Council. In 2009 the Oregon Connections annual  
22 Enduring Achievement Award, which I had previously been awarded, was renamed the  
23 Edwin B. Parker Enduring Achievement Award.

24 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THIS**  
25 **COMMISSION?**

26 A. No.

1 **Q. ON WHICH PARTY'S BEHALF ARE YOU FILING TESTIMONY IN THIS**  
2 **PROCEEDING?**

3 A. In this testimony I am speaking on my own behalf as an Oregon resident who has a  
4 background in Oregon telecommunications technology and policy and who is a customer  
5 of both CenturyLink (in Gleneden Beach) and Qwest (in Portland). I am not representing  
6 any client.

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 A. The purpose of my testimony is to recommend that the Commission approve the proposed  
9 Transaction, subject to commitments to meet conditions that may be necessary to ensure  
10 that the merger causes no harm and is therefore in the public interest, and that the public  
11 safety is taken into account in building and maintaining an adequate infrastructure for  
12 providing reliable service.

13 **Q. PLEASE SET FORTH THE CONDITIONS THAT YOU RECOMMEND THE**  
14 **COMMISSION MANDATE IN THIS PROCEEDING?**

15 A. I urge the commission to adopt the following conditions to the merger:

- 16 1. As a result of numerous system outages, community isolation, and lack of  
17 network redundancy, CenturyLink will construct a physical  
18 communication link between the Cities of Lincoln City and Newport,  
19 Oregon within 24 months following the close of the transaction. The  
20 deployment expectation is that this link construct have at a minimum the  
21 bandwidth capacity of OC-192 in both directions to each community.

22 A. CenturyLink Inc., as part of this condition, shall establish a direct  
23 coastal link for voice and data, meaning the required fiber route  
24 would connect from Lincoln City to Newport along the Oregon  
25 coast.  
26

1           B.     CenturyLink Inc., as part of this condition, shall establish a diverse  
2                 routing for the former Embarq service area in Lincoln & Tillamook  
3                 Counties with a self-healing fiber ring architecture for traffic to and  
4                 from that former Embarq service area, through Newport, and  
5                 Newport through Lincoln City. The fiber ring will functionally  
6                 provide a diverse backup route for both telephone and data services  
7                 from the identified former Embarq service area, to Sheridan and  
8                 the necessary switches outside Sheridan to provide reliable  
9                 intrastate and interstate calling.

10          C.     CenturyLink Inc., as part of this condition will make other network  
11                 or programming changes, such as maintaining a local ANI  
12                 (Automatic Number Identification) database in Oregon, and  
13                 accessible through the fiber ring serving the former Embarq service  
14                 area in Lincoln and Tillamook Counties to provide a functioning  
15                 phone network within the former Embarq service area even if  
16                 service is severed outside said area.

17 **Q.     DO YOU HAVE AN OPINION WHETHER IT IS TECHNICALLY FEASIBLE**  
18 **FOR CENTURYLINK TO ESTABLISH THE TYPE OF SELF-HEALING FIBER**  
19 **RING YOU ARE ASKING TO COMMISSION TO REQUIRE?**

20 A.     Yes.

21 **Q.     WHAT IS THAT OPINION?**

22 A.     It is my opinion that CenturyLink could easily upgrade the fiber connections needed to  
23 meet this proposed condition.

24

25

26

1 **Q. PLEASE EXPLAIN THE BASIS FOR YOUR OPINION?**

2 A. After the merger they will own all of the fiber Qwest owned, and therefore, with what  
3 they obtained from Embarq, nearly a complete ring exists, and it will be under one  
4 ownership. I see no difficult technical barriers to establishing a complete, self-healing  
5 fiber ring that includes all of the coastal district. By coastal district I mean Lincoln  
6 County and Tillamook County especially.

7 **Q. CAN YOU DESCRIBE THE EXISTING FIBER NETWORK THAT CONNECTS**  
8 **LINCOLN AND TILLAMOOK COUNTY?**

9 A. Yes. I think one way to present this information is to refer to a graphic in a publication  
10 by the Oregon Coastal Management Association. This color graphic depicts the state of  
11 the fiber location and ownership as of 2005 and was part of a larger article discussing the  
12 lack of redundant fiber connections in SW Oregon. Exhibit 101 is a page from the  
13 publication that depicts the connections, and I have omitted the balance of the article  
14 pages. The graphic clearly establishes that, once this merger is complete, CenturyLink  
15 will own complete fiber ring pathways which the company could easily employ to  
16 provide a self-healing fiber ring system for both north Lincoln and Tillamook County. In  
17 the public interest of providing adequate telephone service, and requiring CenturyLink to  
18 honor its promises to provide reliable service to the central coast region, the Commission  
19 should require the company do this in a reasonable amount of time.

20 **Q. DO YOU HAVE A SECOND CONDITION YOU URGE THE COMMISSION**  
21 **ADOPT?**

22 A. Yes. This condition relates to reliability and quality of the Internet connections within the  
23 State of Oregon, including the coastal area CenturyLink will control. Currently, intrastate  
24 Internet traffic is routed to Portland, and then to Seattle, and frequently into Sacramento,  
25 California all before it is routed back to an Oregon destination. I have monitored my  
26 corporate- grade DSL connection operated by CenturyLink and confirmed that this

1 routing creates a low quality broadband network, not suitable for voice data or video data.

2 I have submitted charts showing the response times, which frequently exceed the 45  
3 millisecond response time needed for reliable voice video or other real-time applications.

4 Parker Exhibits 102, 103, 104, 105, and 106.

5 Also, the routing into neighboring states increases the risk of loss of service and transit  
6 delay times due to outages or congestion between Portland/Seattle/Sacramento, rather  
7 than limited within Oregon. If CenturyLink plans to try to market broadband services as  
8 the Commission may require, CenturyLink needs to fix their connection issues by having  
9 a system and policy designed to keep intrastate Internet traffic within Oregon. Therefore,  
10 I recommend that the Commission adopt a requirement such as the text of the condition  
11 below, which, in my opinion, will increase the speed and reliability of CenturyLink's  
12 broadband connections so they will be competitive with Charter Communications and  
13 other future providers, maintaining profitability necessary for operations in their rural  
14 areas especially:

- 15 2. In order to improve reliability and speed of Internet data, CenturyLink is  
16 required to connect Oregon Internet data traffic at an Oregon Internet  
17 exchange, such as the NorthWest Access Exchange (NWAX) in Portland,  
18 when the Internet traffic both originates and terminates in Oregon and at  
19 least one end of the connection is on the CenturyLink/Qwest network,  
20 provided that the Oregon Internet Service Provider (OISP) at the other end  
21 of the connection, if applicable, agrees to reasonable terms and conditions  
22 for interconnection. This condition does not require "peering" (free  
23 interconnection) and does not put any additional special requirements on  
24 the business arrangements between CenturyLink and any interconnecting  
25 ISP.

1 **Q. DOES YOUR SECOND CONDITION REQUIRE CENTURYLINK TO PROVIDE**  
2 **CONNECTIONS OR SERVICES FOR FREE?**

3 A. No. The condition only requires the connection when the other provider of the  
4 connection in Oregon agrees to reasonable terms and conditions. It is possible this  
5 would enhance profits for CenturyLink by being able to market a more reliable broadband  
6 connection within their service area and generate more business from interconnecting  
7 ISPs.

8 **Q. IS YOUR SECOND CONDITION TECHNICALLY FEASIBLE IN YOUR**  
9 **OPINION?**

10 A. Yes. I have from my own knowledge of how these connections work, as well as from  
11 discussions with CenturyLink technicians, and know it is very feasible. The only  
12 resistance seems to be from management, who may not understand the technical side of  
13 the issue well enough to judge its feasibility, which is perhaps why they may oppose it.

14 **Q. DO YOU SEE ANY POTENTIAL WEAKNESSES IN THE STAFF'S**  
15 **RECOMMENDED CONDITION REQUIRING A DIRECT CONNECTION**  
16 **BETWEEN LINCOLN CITY AND NEWPORT?**

17 A. Yes.

18 **Q. PLEASE STATE WHAT YOU THINK ARE AMONG THE POTENTIAL**  
19 **WEAKNESSES?**

20 A. First, I am concerned that the staff condition is apparently intended only to provide  
21 improved network capacity between Lincoln City and Newport. While necessary, this  
22 will not be sufficient to make 911 emergency services work reliably on the central coast.  
23 In addition, telephone service and Internet service will not be reliable on the central coast  
24 until additional steps are taken. My major concern is that it does not provide for a  
25 comprehensive fix to the recurring network reliability problems on the central coast and  
26



1 will not be sufficient for CenturyLink to meet its prior promises to provide reliable 911  
2 and telephone service on the central coast.

3 My concerns with the condition, as written include:

4 1. The staff condition does not address how the numerous switches (remote  
5 switches) in north Lincoln County and Tillamook County, which depend  
6 on the Sheridan switch (host switch) to operate and do not connect with  
7 other remote switches in the region when the Sheridan switch is isolated.  
8 If the central coast remote switches are not connected to their host switch  
9 with self-healing ring technology, or to an alternate host switch, there will  
10 be no change in the number of subscribers that will be without local  
11 phone service or 911 emergency services during a severance of the kind  
12 experienced over recent years.

13 2. The staff condition does not address the need for reliable access from the  
14 present CenturyLink Sheridan switch to the Qwest tandem switch in the  
15 Willamette Valley so that subscribers and non-subscribers of the extended  
16 area service (EAS) can be identified for billing purposes. In cases where  
17 the tandem switch cannot be reached, I understand that no extended area  
18 service (EAS) calls can be made, and thus, calls could not be made to  
19 Newport or Gleneden Beach from Lincoln City, even though they are all  
20 in the same EAS service area. The May 2010 outage was caused by a fiber  
21 severance between Sheridan and Salem, though it affected more than EAS  
22 calls for some reason. For CenturyLink's remote switches in Lincoln and  
23 Tillamook counties to provide the EAS services that customers perceive  
24 as local calling, they have to communicate with switching equipment and  
25 software somewhere east of Sheridan. The staff condition does not seem  
26 to address this requirement, and does not seem to have reflected an

1 investigation into effects of the May 2010 outage on the network  
2 generally.

- 3 3. Functionally, if the condition were implemented without self-healing ring  
4 architecture, the benefits would be limited. The problem the PUC should  
5 be concerned with is network changes that make it possible that all the  
6 citizens in Lincoln and Tillamook counties can call their PSAP for action  
7 when there is a fiber severance that would normally cause an outage.  
8 Reliable calling between points on the new central coast capacity Staff is  
9 recommending would still require diverse routing to the valley for the  
10 signaling circuit to make the local coastal connections work. Staff is not  
11 recommending such diverse routing, and thus, the situation will not be  
12 improved during a fiber severance. If diverse routing were provided only  
13 for the signaling circuit, then local calling would be improved, but coastal  
14 residents and businesses would still not be able to make calls outside the  
15 local region when the single line serving the region is severed due to loss  
16 of connection to the Qwest tandem switch. Local connectivity that  
17 permits every CenturyLink phone on the central coast to reach a local  
18 PSAP when dialing 911 is critically important to providing adequate  
19 service, but such service is not sufficient to meet all public safety needs.  
20 Losing local service because of a single point of failure between the coast  
21 and the valley is unacceptable. However, in the event of an emergency on  
22 the coast, connectivity to hospitals and support services in the valley is  
23 also critically important. Ring architecture should be used for both  
24 signaling circuits and the voice traffic those signals control. The state has  
25 mandated PSAP consolidation, which has been impossible in Lincoln  
26 County because the lack of reliable telephone service connectivity

1 prohibited it. Diverse routing for the "out-of-band" signaling circuit would  
2 permit local connectivity on the coast, but would not permit voice and data  
3 traffic outside of an isolated coastal region. The staff condition, therefore,  
4 does not appear to address the central problem in a way that solves the  
5 problem, and therefore it should be modified.

6  
7 Edwin B. Parker

Edwin B. Parker

8 STATE OF OREGON )

9 County of Lincoln )

ss.

10 This instrument was signed and acknowledged before me and in my presence on  
11 this 24th day of August, 2010 by Edwin B. Parker.



Cristi S. Fritz  
Notary Public for Oregon

My Commission Expires: 12/28/2011



## It's About Connectivity!

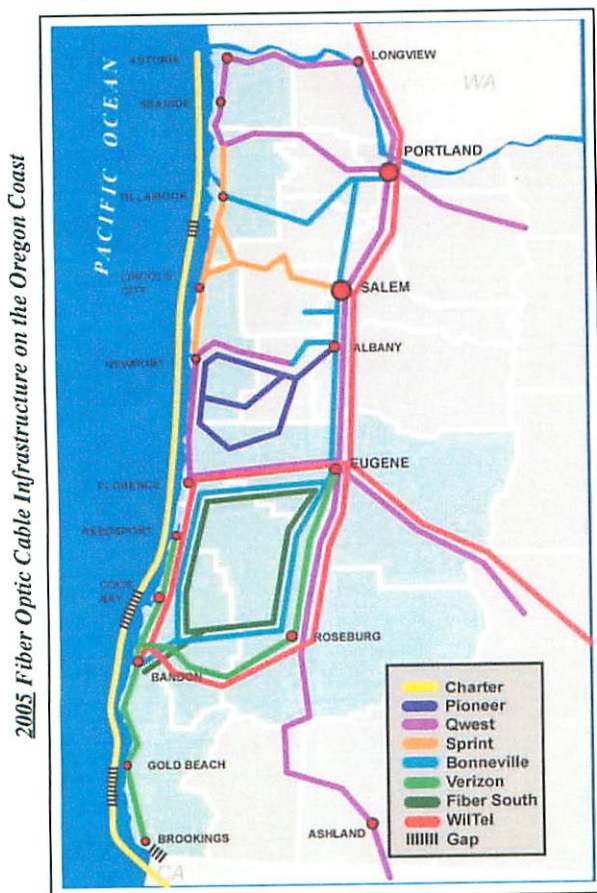
It was October 2005 in Bend, Oregon at the Oregon Connections Telecommunications Conference ([www.oregonconnections.info](http://www.oregonconnections.info)). I was giving a talk about OCZMA's *Coastal Telecommunications Strategy*. The people attending those conferences are, for the most part, telecommunications professionals and local government officials with a strong interest in telecommunications. More than anybody, they understand the transformative power of the Internet. So, during my talk, the audience looked bored because I was preaching to the choir.

As soon as I finished, former Curry County Commissioner Marlyn Schafer (photo at right) confronted me. Former Commissioner Schafer exclaimed, "Onno! That's all fine and good. But, in my County, Curry County, we don't have fiber optic route redundancy! And, many of our people don't have access to any kind of broadband. *We're still on dial-up!* We've urged Verizon and the others to improve their services. They keep putting us off. Before we can do any of the things you're talking about we need basic connectivity!"



Former Commissioner Schafer was correct. Especially in 2005, Curry County was squarely on the wrong side of the digital divide. Five years later, Curry County still doesn't have access to a route redundant fiber optic network (a loop). And, some unincorporated communities in Curry County, even places along the U.S. Highway 101 corridor, still don't have access to broadband.

## Why is Fiber Optic Route Redundancy a Big Deal?



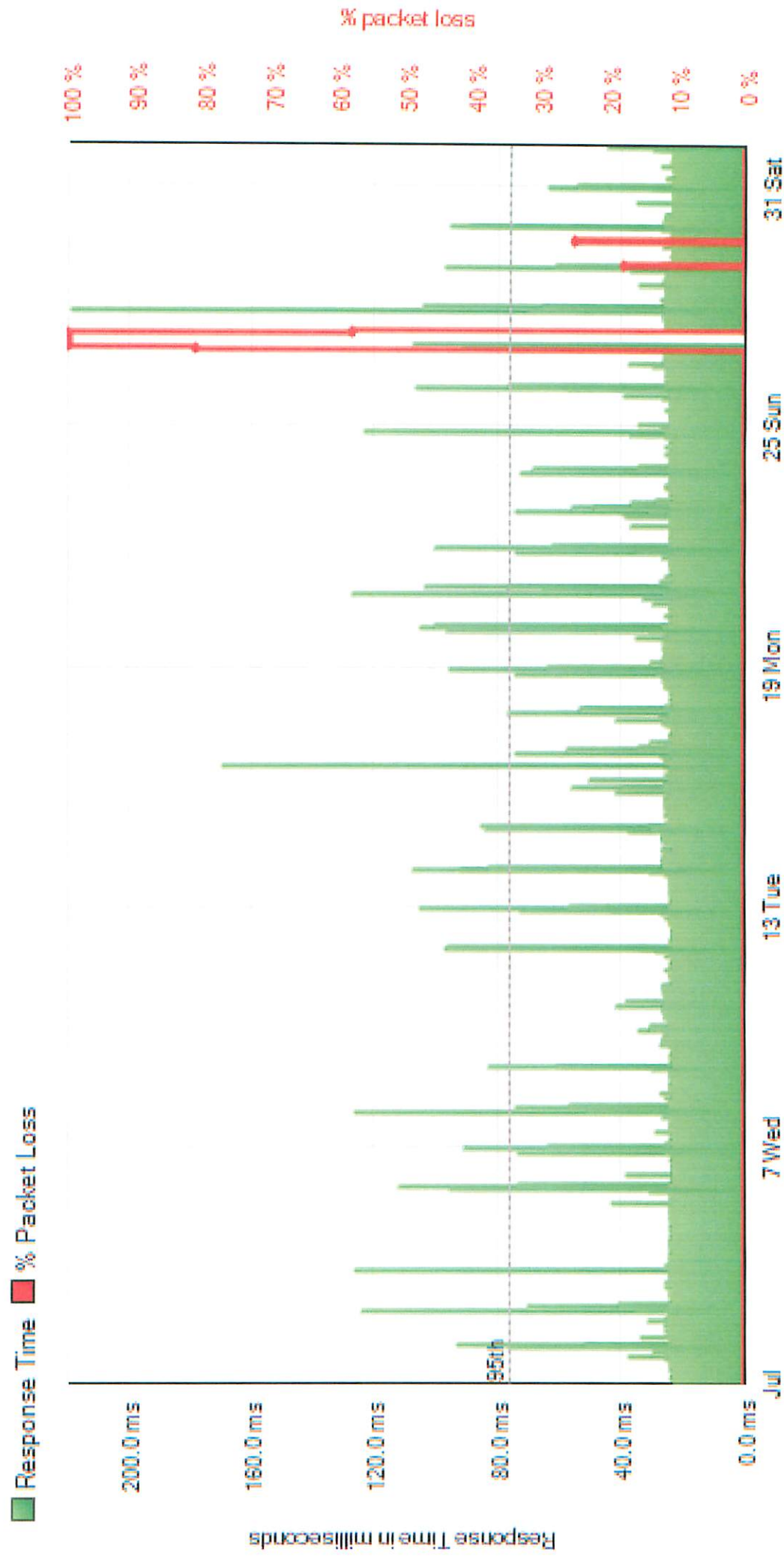
Fiber optic cables carry incredible volumes of Internet traffic at the speed of light. Digital traffic—whether it travels over a wire or through the air on a wireless network—must find its way to a fiber optic backbone network.

By the fall of 2005, most of the Oregon Coast (from Astoria to Bandon) enjoyed pretty good access to route-redundant fiber optic networks. But, even today, Southern Coos County (South of Bandon), Curry County, and, four Northern Counties in California, don't have access to self-healing route-redundant fiber backbone networks.

Why is that such a problem? Well, about once a year or so, for one reason or another, Verizon or Charter Communications fiber optic lines to Curry County get damaged. That happens to all cables. Because the Internet traffic on those lines can't be re-routed through another path, through self-healing a ring, virtually all out-of-the-area communications can be shut down for hours at a time. That means, on that carrier's network, no phone service, no credit card/debit card transactions, no Internet services (dial-up or broadband), and, in Verizon's case, because they are the Incumbent Local Exchange Carrier (ILEC), 9-1-1 services are greatly impaired. That's scary!

# LN\_Ed Parker

Average Response Time & Packet Loss  
LAST MONTH



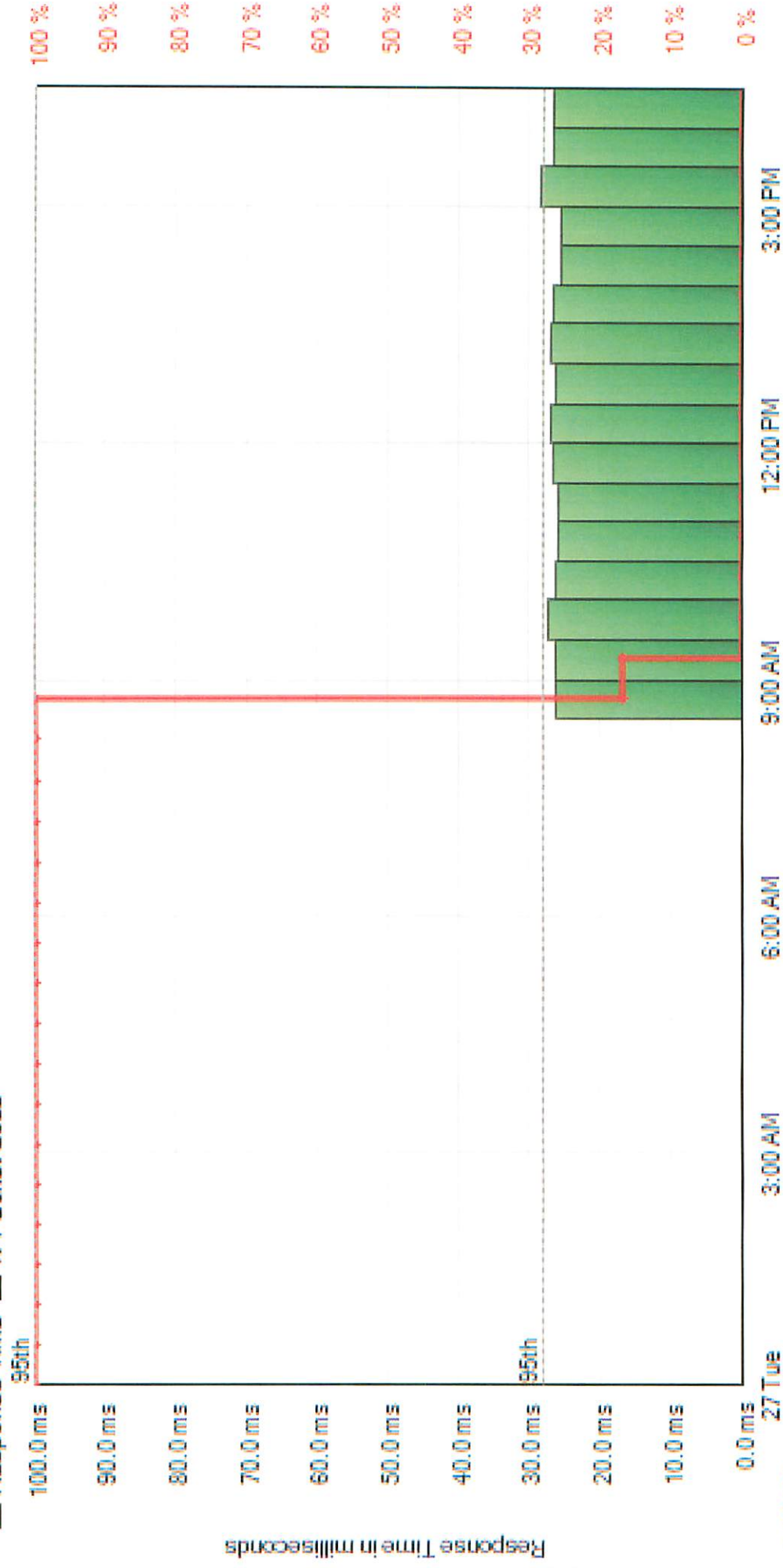
2010  
95th Percentile: Response Time is 76.0 ms  
SolarWinds Orion Core Services 2010.1



# LN\_Ed Parker

Average Response Time & Packet Loss  
TODAY

■ Response Time ■ % Packet Loss

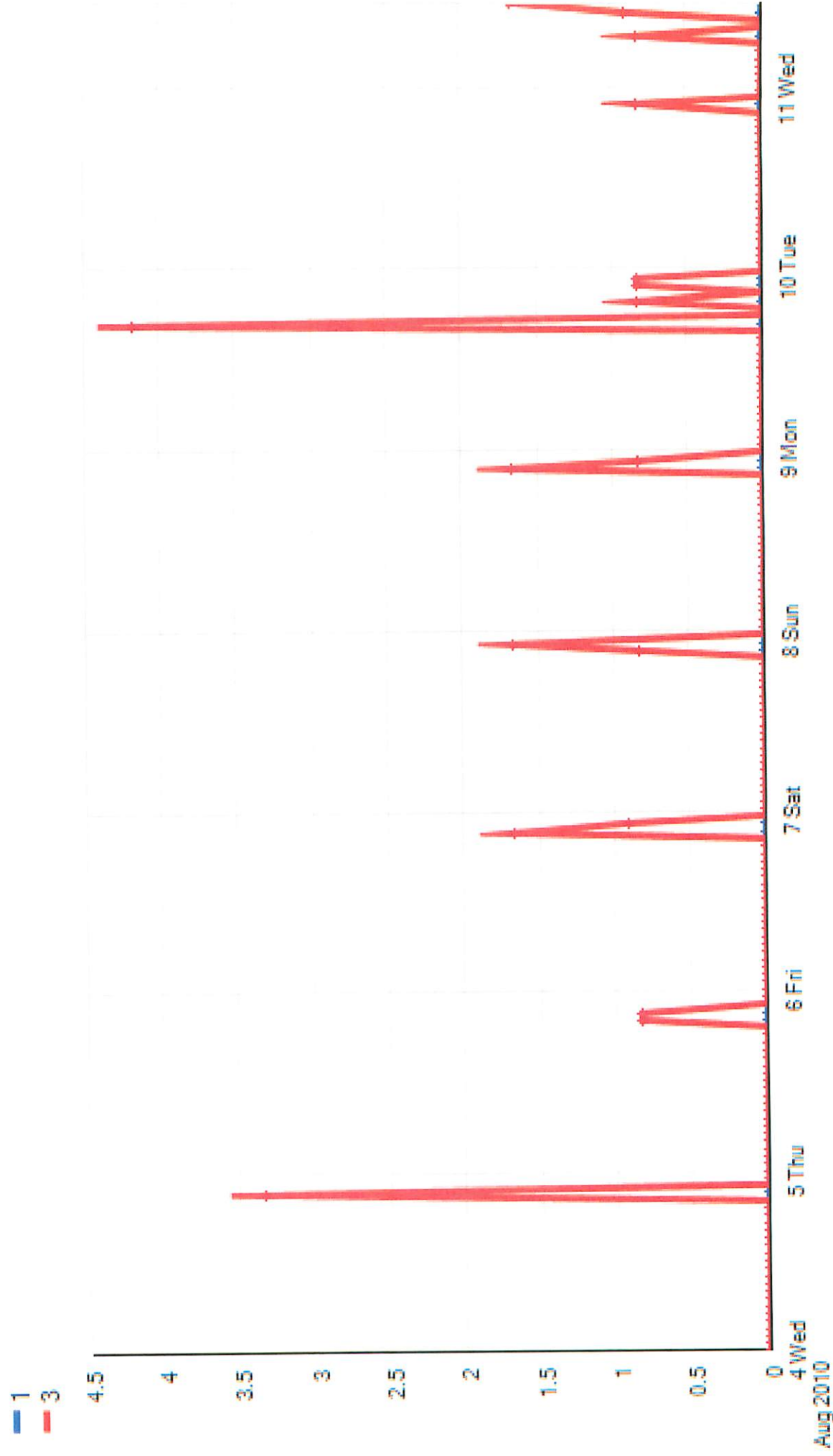


Jul 2010  
 95th Percentile: Response Time is 28.0 ms, % Packet Loss is 100.0 %  
 SolarWinds Orion Core Services 2010.1

# % Packet Loss (Destination --> Source)

Threshold = 0.3%

LN\_Ed Parker



Trace Route from CenturyLink Gleneden Beach to OHSU Portland

June 20, 2010

Microsoft Windows [Version 6.1.7600]

Copyright (c) 2009 Microsoft Corporation. All rights reserved.

C:\Users\Ed Parker>tracert ohsu.edu

Tracing route to ohsu.edu [137.53.10.2] over a maximum of 30 hops:

```
 1  <1 ms  <1 ms  <1 ms  192.168.2.1
 2  1 ms   <1 ms  <1 ms  64-91-127-233.stat.centurytel.net [64.91.127.233]
 3  14 ms  13 ms  13 ms  rb-bras.aur.centurytel.net [69.29.185.50]
 4  14 ms  15 ms  14 ms  aurrorcoro2.aurrorcoro1.centurytel.net [209.206.179.130]
 5  19 ms  18 ms  18 ms  ge-6-1.car3.Seattle1.Level3.net [4.79.104.41]
 6  23 ms  18 ms  18 ms  ae-31-51.ebr1.Seattle1.Level3.net [4.68.105.30]
 7  87 ms  200 ms  199 ms  ae-2-2.car1.Sacramento1.Level3.net [4.69.132.153]
 8  34 ms  33 ms  33 ms  ae-11-11.car2.Sacramento1.Level3.net [4.69.132.150]
 9  43 ms  43 ms  44 ms  LIGHTSPEED.car2.Sacramento1.Level3.net [4.53.202.6]
10  47 ms  47 ms  46 ms  vl-17-PTLDORPBCR01.lsnetworks.net [216.110.192.41]
11  *      *      *      Request timed out.
12  *      *      *      Request timed out.
13  36 ms  36 ms  36 ms  137.53.223.130
14  *      *      *      Request timed out.
15  40 ms  42 ms  37 ms  ohsu.edu [137.53.10.2]
```

Trace complete.

C:\Users\Ed Parker



Microsoft Windows [Version 6.1.7600]  
Copyright (c) 2009 Microsoft Corporation. All rights reserved.

C:\Users\Ed Parker> tracert nms.easystreet.com

Tracing route to nms.easystreet.com [69.30.26.148]  
over a maximum of 30 hops:

```
 1  2 ms  <1 ms  <1 ms  192.168.2.1
 2  1 ms   1 ms   1 ms  64-91-127-233.stat.centurytel.net [64.91.127.233]
]
 3  14 ms  14 ms  14 ms  rb-bras.aur.centurytel.net [69.29.185.50]
 4  16 ms  14 ms  15 ms  aurrorcoro2.aurrorcoro1.centurytel.net [209.206.
179.130]
 5  20 ms  19 ms  19 ms  ge-6-1.car3.Seattle1.Level3.net [4.79.104.41]
 6 144 ms  63 ms 213 ms ae-11-51.car1.Seattle1.Level3.net [4.68.105.2]
 7  23 ms  23 ms  23 ms  EASYSTREET.car1.Seattle1.Level3.net [4.53.146.70]
]
 8  25 ms  24 ms  24 ms  209.162.220.74
 9  *      *      *      Request timed out.
10  26 ms  23 ms  23 ms  69.30.1.84
11  24 ms  24 ms  24 ms  69.30.26.148
```

Trace complete.



CASE: UM 1484  
WITNESS: Lt. Jerry Palmer

PUBLIC UTILITY COMMISSION  
OF  
OREGON

PARKER TELECOMMUNICATIONS EXHIBIT 200

In the Matter of	)	
	)	Lieutenant Jerry Palmer's Direct
CENTURYLINK, INC.	)	Testimony in Support of Parker
	)	Telecommunications Proposed
Application for merger between CenturyTel,	)	Conditions
Inc. and Qwest Communications International,	)	
Inc.	)	

August 24, 2010

1 **Q. PLEASE STATE YOUR NAME, ADDRESS & YOUR EMPLOYER?**

2 A. Jerry Palmer. I am a Lieutenant with the City of Lincoln City Police Department, located  
3 at 1503 SE East Devils Lake Rd., Lincoln City, Oregon.

4 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**  
5 **PROFESSIONAL EXPERIENCE?**

6 A. I have served as a police officer for about 31 years. I spent 28 years with the Oregon State  
7 Police, retiring as an Area Commander in 2005. I joined the Lincoln City Police  
8 Department as a Lieutenant in 2007 and have been the 911 Center Supervisor during this  
9 time.

10 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THIS**  
11 **COMMISSION?**

12 A. No.

13 **Q. ON WHICH PARTY'S BEHALF ARE YOU FILING TESTIMONY IN THIS**  
14 **PROCEEDING?**

15 A. My testimony is in support of the proposed conditions submitted by Parker  
16 Telecommunications.

17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

18 A. My testimony is offered to prove the effects of the lack of network reliability on public  
19 safety and emergency response in north Lincoln County, including Lincoln City.

20 **Q. IN YOUR CAPACITY FOR LINCOLN CITY, WOULD YOU DESCRIBE WHAT**  
21 **OCCURS WITHIN THE LINCOLN CITY AREA WHEN THE TELEPHONE**  
22 **LINES GO DOWN FOR ANY REASON?**

23 A. Depending on the type and severity of the outage, my primary concern is the inability of  
24 some or all of our community to use the 911 system to obtain emergency services. Over  
25 the past few years we have experienced everything from just certain areas of town being  
26 cut off to the entire north end of Lincoln County. We have also encountered major cell

1 phone interruption due to at least one major carrier being reliant on the telephone lines to  
2 maintain their services as well. In all cases the public's ability to use the phone system for  
3 911 services has been significantly impaired.

4 **Q. DO YOU HAVE CONCERNS ABOUT PUBLIC SAFETY DURING PHONE**  
5 **OUTAGES?**

6 A. Yes.

7 **Q. WHAT ARE YOUR CONCERNS?**

8 A. With respect to public safety, the majority of north county residents cannot phone Lincoln  
9 City's 9-1-1 center or any other for that matter. Neither can a majority phone the  
10 hospital. So far, we have been lucky that no one has been injured or died unnecessarily  
11 during these outages. Lincoln City averages 4.5 calls per day for an ambulance, alone.  
12 During the outages we are also unable to transfer these calls to other 911 centers.

13 **Q. WHAT HAS BEEN THE DURATION OF TELEPHONE OUTAGES IN**  
14 **LINCOLN CITY THAT YOU KNOW ABOUT?**

15 A. From a few hours to a few days, as measured by the events of the last four years.

16 **Q. DO YOU SUPPORT THE MERGER CONDITIONS PROPOSED BY PARKER**  
17 **TELECOMMUNICATIONS AS A WAY TO ADDRESS THE TELEPHONE**  
18 **NETWORK ISSUES IN LINCOLN AND TILLAMOOK COUNTY?**

19 A. I do support this proposal. Our goal and intent is to ensure that there is redundancy built  
20 into our phone system that allows continued 911 phone service to our communities in  
21 Tillamook and Lincoln Counties in the event of a line or system failure. By meeting the  
22 conditions proposed by Parker Telecommunications we will be taking significant steps to  
23 improve the reliability of the system so that a cut line or other failure in one part of the  
24 system does not take the whole system down.

25

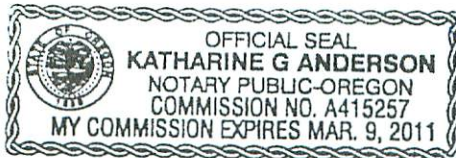
26

1 I do not want anyone's family members or friends to not be able to obtain emergency  
2 services just because we fail to ensure the reliability of our telephone system. With this  
3 cooperation, it is within our ability to make the system safer and more dependable.

4  
5  
6   
Jerry Palmer

7 STATE OF OREGON       )  
8                                )       ss.  
County of Lincoln        )

9 This instrument was signed and acknowledged before me and in my presence on  
10 this 23 day of August, 2010 by Jerry Palmer.



  
Notary Public for Oregon  
My Commission Expires: mar 9, 2011

CASE: UM 1484  
WITNESS: David Hawker

PUBLIC UTILITY COMMISSION  
OF  
OREGON

PARKER TELECOMMUNICATIONS EXHIBIT 300

In the Matter of	)	
	)	David Hawker's Direct
CENTURYLINK, INC.	)	Testimony in Support of Parker
	)	Telecommunications Proposed
Application for merger between CenturyTel,	)	Conditions
Inc. and Qwest Communications International,	)	
Inc.	)	

August 24, 2010

1 **Q. PLEASE STATE YOUR NAME, ADDRESS & YOUR EMPLOYER?**

2 A. David Hawker. I am the City Manager for the City of Lincoln City. My office is located  
3 at city hall, 801 SW Highway 101, Lincoln City, Oregon

4 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**  
5 **PROFESSIONAL EXPERIENCE?**

6 A. I hold a Masters of Public Administration from the University of Colorado. I have been  
7 City Manager of Lincoln City for 10 ½ years. Prior to that I managed three Colorado  
8 cities for over six years each.

9 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THIS**  
10 **COMMISSION?**

11 A. No.

12 **Q. ON WHICH PARTY'S BEHALF ARE YOU FILING TESTIMONY IN THIS**  
13 **PROCEEDING?**

14 A. My testimony is in support of the proposed conditions submitted by Parker  
15 Telecommunications.

16 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17 A. My testimony is offered to prove the effect of the telephone outages and the City's several  
18 attempts to get Embarq, CenturyTel or CenturyLink to provide a solution.

19 **Q. IN YOUR CAPACITY AS CITY MANAGER FOR LINCOLN CITY, WOULD**  
20 **YOU DESCRIBE WHAT OCCURS WITHIN THE LINCOLN CITY AREA**  
21 **WHEN THE TELEPHONE LINES GO DOWN FOR ANY REASON?**

22 A. I am a resident of Lincoln City, and a customer of CenturyLink. Within the City of  
23 Lincoln City area are approximately 8,000 subscribers. As part of the legacy Embarq  
24 wire line system, I am personally aware of the community isolation which follows every  
25 fiber severance with the valley, because there is no redundant fiber ring in place, nor any  
26 other working technology. However, in addition to community-to-community isolation,

1 telephone service within the community during the outages is erratic as is the ability to  
2 reach the City's 911 center.

3 **Q. DO YOU HAVE AN UNDERSTANDING ABOUT THE TYPE OF PROBLEMS**  
4 **THAT HAVE OCCURRED WITH THE PHONE SYSTEM WHICH RESULTS IN**  
5 **THE OUTAGES YOU HAVE DESCRIBED?**

6 A. Yes.

7 **Q. WHAT IS YOUR UNDERSTANDING?**

8 A. The single fiber route from Lincoln City to the valley has been severed approximately two  
9 times. The failures have occurred between Grand Ronde and Sheridan in the former  
10 Embarq fiber, and past Grand Ronde in the Quest fiber. The Sheridan switching station  
11 generator failed once.

12 **Q. WHAT HAS BEEN THE DURATION OF TELEPHONE OUTAGES IN**  
13 **LINCOLN CITY THAT YOU KNOW ABOUT?**

14 A. Hours to a few days.

15 **Q. DO YOU HAVE CONCERNS ABOUT PUBLIC SAFETY DURING THE TIMES**  
16 **OF THESE OUTAGES?**

17 A. Yes.

18 **Q. WHAT ARE THOSE CONCERNS?**

19 A. Without the ability to phone the Lincoln City 9-1-1 center, crimes and medical  
20 emergencies may not be addressed. I also know there are significant economic effects  
21 when credit card transactions and hotel reservations cannot occur within the business  
22 community. The City has over 3,500 hotel rooms, and depends heavily on that industry.

23 **Q. HAVE YOU, ON BEHALF OF LINCOLN CITY, PREVIOUSLY ASKED**  
24 **EMBARQ TO MAKE CHANGES TO IT'S PHONE SERVICES SO THAT**  
25 **CITIZENS OF THE CITY CAN ALL CALL THE 911 CENTER?**

26 A. Yes.



1 **Q. WHEN DID YOU FIRST START ASKING EMBARQ TO MAKE THESE**  
2 **CHANGES?**

3 A. January 2009

4 **Q. DID YOU AT THE TIME UNDERSTAND EXACTLY WHAT NEEDED TO BE**  
5 **DONE, OR DID YOU TRUST THAT EMBARQ WOULD BE ABLE TO FIGURE**  
6 **IT OUT?**

7 A. I did not know exactly what needed to be done at that time, and trusted Embarq to make  
8 the necessary improvements. Prior to this time we had been assured by Sprint (Embarq's  
9 predecessor) that the Emergency Stand Alone system was in place for the community.  
10 That turned out not to be true.

11 **Q. DID EMBARQ, PRIOR TO ITS MERGER WITH CENTURYTEL, MAKE ANY**  
12 **PROMISES TO THE CITY ABOUT CHANGES IT WOULD MAKE TO THE**  
13 **SERVICES SO THAT IT'S CUSTOMERS IN THE LINCOLN CITY AREA**  
14 **WOULD HAVE LANDLINE ACCESS TO THE CITY'S 911 CENTER?**

15 A. They indicated that some problems with the Emergency Stand Alone System would be  
16 fixed and stated "Push the need for fiber redundancy between Grand Ronde and Sheridan  
17 to Embarq's upper management. This will become increasingly important as more  
18 switches are connected to the Sheridan switch."

19 **Q. DO YOU THINK EMBARQ PERFORMED OR MADE GOOD ON ITS**  
20 **PROMISES?**

21 A. I believe that some of the problems with the Emergency Stand Alone System were fixed.  
22 We presently do not know to what extent the Emergency Stand Alone System is  
23 operational. I know of no substantive progress on fiber redundancy.  
24  
25  
26

1 **Q. AFTER THE MERGER, DID YOU HAVE ANY MEETINGS WITH**  
2 **CENTURYTEL OR CENTURYLINK EMPLOYEES ABOUT THE SAME ISSUE**  
3 **YOU HAD DISCUSSED EARLIER WITH EMBARQ ABOUT SERVICE**  
4 **RELIABILITY AND REDUNDANCY?**

5 A. Yes. I attended one meeting in June of this year.

6 **Q. DID CENTURYTEL OR CENTURYLINK MAKE ANY PROMISES TO**  
7 **LINCOLN CITY ABOUT THE CHANGES THE CITY HAS SOUGHT SINCE**  
8 **EMBARQ?**

9 A. Yes

10 **Q. WHAT WERE THOSE PROMISES, IF ANY, AND WHEN DID THEY MAKE**  
11 **THEM?**

12 A. Lisa Willis, Manager Public Relations on December 18, 2009 sent the City an email  
13 stating: "I am responding to your update request on the reroute project to create diverse  
14 service in Lincoln City. We are making progress on this project. We have determined  
15 the best route and are in the process of contracting with the second parties for line usage.  
16 Once we have the agreements in place, we can move forward. Our area operations  
17 manager is diligently working toward securing the rights to the line usage."

18 **Q. IN YOUR VIEW, DID EMBARQ DO ANYTHING SUBSTANTIVE TO IMPROVE**  
19 **THE SERVICE RELIABILITY IN THE LINCOLN CITY AREA?**

20 A. As far as the Emergency Stand Alone System, probably. As far as redundancy, not to my  
21 knowledge.

22 **Q. IN YOUR VIEW, DID CENTURYLINK OR CENTURYTEL DO ANYTHING**  
23 **SUBSTANTIVE TO IMPROVE THE SERVICE RELIABILITY IN THE**  
24 **LINCOLN CITY AREA YOU HAVE BEEN CONCERNED ABOUT?**

25 A. Not to my knowledge.  
26

1 **Q. FROM BEFORE THE TIME YOU FIRST BECAME AWARE OF THE**  
2 **PROBLEM CITIZENS HAVE CALLING THE 911 CENTER WHEN THE LAND**  
3 **LINES ARE DOWN, UNTIL NOW, TO YOUR KNOWLEDGE, HAVE THERE**  
4 **BEEN ANY CHANGES TO THE EQUIPMENT OR PROGRAMMING THAT**  
5 **HAVE SUBSTANTIALLY ADDRESSED THE ABILITY OF ALL LINCOLN**  
6 **CITY AREA CITIZENS TO PHONE THE 911 CENTER?**

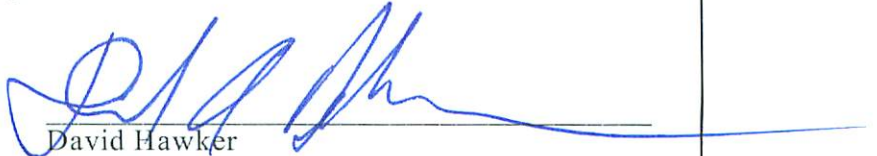
7 A. Some of the problems with the Emergency Stand Alone System have probably been  
8 fixed. To the best of my knowledge, some of the neighborhoods in the Lincoln City area  
9 will not have ESAS or local service, and therefore can't reach the City's 911 center. The  
10 ESAS will not provide critical address information on the 911 calls received through this  
11 system. It is my understanding that the ESA if fully functional would not have the  
12 capacity to deal with emergencies the fully functional system has.

13 **Q. IS THERE A LEGAL REQUIREMENT THAT LINCOLN CITY MAINTAIN A**  
14 **PSAP?**

15 A. Yes. ORS 403.115 makes it mandatory for all public safety agencies to maintain a public  
16 safety answering point ("PSAP"), or 9-1-1 call center. The current configuration of the  
17 telephone network in Lincoln City does not meet the statutory minimums required by  
18 ORS 403.115 during an outage because only a few of the switches in Lincoln City are  
19 connected to its PSAP during an outage, and there is no automatic display of the  
20 incoming telephone number and address. While the City's PSAP is connected to the  
21 Ocean Lake switch, many of the switches are not connected to the Ocean Lake switch  
22 during an outage, limiting the number of subscribers who can reach the PSAP. It may be  
23 the case that only one phone line is connecting the Taft area to the PSAP during an  
24 outage. It is also possible CenturyLink and/or the providing government could be held  
25 liable under ORS 403.110 if the network is not fixed, and someone is unable to reach the  
26 City or county PSAP and dies or suffers greater injuries as a result.

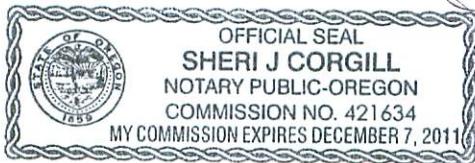
1 Q. DO YOU SUPPORT THE CONDITIONS PROPOSED BY PARKER  
2 TELECOMMUNICATIONS AS A SOLUTION TO THE LACK OF A RELIABLE  
3 TELEPHONE NETWORK IN NORTH LINCOLN COUNTY?

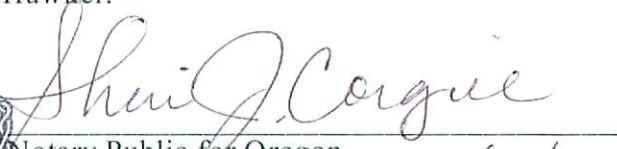
4 A. Yes, the conditions are critical to the welfare of the Lincoln City area residents, and the  
5 economic vitality of the community.

6  
7   
8 David Hawker

9 STATE OF OREGON )  
10 ) ss.  
11 County of Lincoln )

12 This instrument was signed and acknowledged before me and in my presence on  
13 this 23<sup>rd</sup> day of August, 2010 by David Hawker.



  
Notary Public for Oregon  
My Commission Expires: 12/7/11

CASE: UM 1484  
WITNESS: Gordon McCraw

PUBLIC UTILITY COMMISSION  
OF  
OREGON

PARKER TELECOMMUNICATIONS EXHIBIT 400

In the Matter of	)	
	)	Gordon McCraw's Direct
CENTURYLINK, INC.	)	Testimony in Support of Parker
	)	Telecommunications Proposed
Application for merger between CenturyTel,	)	Conditions
Inc. and Qwest Communications International,	)	
Inc.	)	

August 24, 2010

1 **Q. PLEASE STATE YOUR NAME, ADDRESS & YOUR EMPLOYER?**

2 A. Gordon McCraw. I am a deputy with the Tillamook County Sheriff's office, and my  
3 duties include being the Director of Emergency Management for Tillamook County since  
4 2008. My office address is 5995 Long Prairie Road Tillamook, Oregon 97141.

5 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**  
6 **PROFESSIONAL EXPERIENCE?**

7 A. I am a High School Graduate with about 2 years of college and have completed numerous  
8 military trade schools, was both a certified Air Traffic Controller and a Meteorologist.  
9 After retiring from the US Navy, I went into law enforcement and was POST certified by  
10 the State of Louisiana which was transferred to the State of Oregon. After being  
11 promoted into my current position I completed all requirements for, and am now an  
12 Oregon Certified Emergency Management Specialist.

13 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THIS**  
14 **COMMISSION?**

15 A. No.

16 **Q. ON WHICH PARTY'S BEHALF ARE YOU FILING TESTIMONY IN THIS**  
17 **PROCEEDING?**

18 A. My testimony is in support of the proposed conditions submitted by Parker  
19 Telecommunications.

20 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

21 A. My testimony is to provide evidence of recent telephone outages in Tillamook County  
22 and the effects it has on public safety.

23

24

25

26

1 **Q. IN YOUR CAPACITY AS THE EMERGENCY MANAGER FOR TILLAMOOK**  
2 **COUNTY, WOULD YOU DESCRIBE WHAT OCCURS WITHIN TILLAMOOK**  
3 **COUNTY WHEN THE TELEPHONE LINES GO DOWN FOR ANY REASON?**

4 **A.** In addition to being the emergency manager, I am a resident of Tillamook County, and  
5 was a customer of CenturyLink. As part of the legacy Embarq wire line system, I am  
6 personally aware of the community isolation which follows every fiber severance with  
7 and in the valley, because there is no redundant fiber ring in place. However, in addition  
8 to community to community isolation, individuals by and large cannot phone any other  
9 individual under these circumstances. It has been my observation that as a result of these  
10 severances, citizens can not dial 9-1-1 for emergencies of any kind.

11 **Q. DO YOU HAVE AN UNDERSTANDING ABOUT THE TYPE OF PROBLEMS**  
12 **THAT HAVE OCCURRED WITH THE PHONE SYSTEM WHICH RESULTS IN**  
13 **THE OUTAGES YOU HAVE DESCRIBED?**

14 **A.** Yes.

15 **Q. WHAT IS YOUR UNDERSTANDING?**

16 **A.** In all but one of the 3 or 4 outages since 2007, it has been a fiber cable break in the  
17 valley. The one that was not a break was the result of a power outage or a fire in the  
18 switching center in the Sheridan area.

19 **Q. WHAT HAS BEEN THE DURATION OF TELEPHONE OUTAGES IN**  
20 **TILLAMOOK COUNTY THAT YOU KNOW ABOUT?**

21 **A.** These outages have been anywhere from 8 hours to as long as several days (2007).

22 **Q. DO YOU HAVE CONCERNS ABOUT PUBLIC SAFETY DURING THE TIMES**  
23 **OF THESE OUTAGES?**

24 **A.** Yes.  
25  
26

1 **Q. WHAT ARE THOSE CONCERNS?**

2 A. The entire county is without the ability to report a crime or medical emergency by dialing  
3 9-1-1 and reaching the PSAP. Delays, particularly in communicating and responding to a  
4 medical emergency can cost lives.

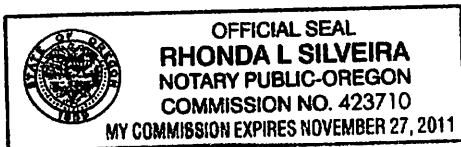
5 **Q. DO YOU SUPPORT THE MERGER CONDITIONS PROPOSED BY PARKER**  
6 **TELECOMMUNICATIONS AS A WAY TO ADDRESS THE TELEPHONE**  
7 **NETWORK ISSUES IN LINCOLN AND TILLAMOOK COUNTY?**

8 A. I support any merger condition that would enhance the communications ability of the  
9 citizens of Tillamook County to communicate, especially to the District's 911 facility in  
10 times of emergencies. This support extends to our supporting neighboring counties as  
11 well.

12  
13   
14 Gordon McCraw

15 STATE OF OREGON           )  
16                                    )       ss.  
17 County of Tillamook       )

18 This instrument was signed and acknowledged before me and in my presence on  
19 this 23 day of August, 2010 by Gordon McCraw.



20   
21 Notary Public for Oregon

22 My Commission Expires: Nov 27, 2011



CASE: UM 1484  
WITNESS: Dennis Manning

PUBLIC UTILITY COMMISSION  
OF  
OREGON

PARKER TELECOMMUNICATIONS EXHIBIT 500

In the Matter of	)	
	)	Dennis Manning's Direct
CENTURYLINK, INC.	)	Testimony in Support of Parker
	)	Telecommunications Proposed
Application for merger between CenturyTel,	)	Conditions
Inc. and Qwest Communications International,	)	
Inc.	)	

August 24, 2010

1 **Q. PLEASE STATE YOUR NAME & ADDRESS?**

2 A. Dennis Manning. 14595 Misty Drive Cloverdale Oregon

3 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**  
4 **PROFESSIONAL EXPERIENCE?**

5 A. Some College, 38 years in the telecommunications industry. I have held positions as  
6 District Manager for both North Texas and Oregon. I have been the acting Director for  
7 the State of Texas and have also been an operations Supervisor on the Oregon Coast and  
8 the Columbia Gorge. I held positions as a Staff Specialist and an Organizational  
9 Development internal Consultant.

10 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THIS**  
11 **COMMISSION?**

12 A. No.

13 **Q. ON WHICH PARTY'S BEHALF ARE YOU FILING TESTIMONY IN THIS**  
14 **PROCEEDING?**

15 A. My testimony is in support of the proposed conditions submitted by Parker  
16 Telecommunications.

17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

18 A. The purpose of my testimony is to provide evidence of the lack of telephone network  
19 reliability in Tillamook County and to provide testimony about the management changes  
20 that occurred after Embarq-CenturyTel merger. My personal knowledge about these  
21 matters stems from the fact I am a subscriber to CenturyLink's phone service and I am a  
22 former manager for Embarq and CenturyTel.

23 **Q. WHAT WAS YOUR POSITION WITH EMBARQ?**

24 A. I was a regional supervisor managing from Taft up through to Rockaway and east to  
25 Carlton.  
26

1 **Q. AFTER THE EMBARQ MERGER WITH CENTURYTEL, DID YOUR JOB**  
2 **CHANGE?**

3 A. Yes. I was replaced by one of CenturyTel's Supervisors from the valley.

4 **Q. WAS YOUR REPLACEMENT'S TERRITORY CHANGED IN ANY WAY FROM**  
5 **THE TERRITORY YOU MANAGED?**

6 A. Yes. My replacement took over a larger geographic area than I managed.

7 **Q. WHAT WAS THE NEW GEOGRAPHIC AREA FOR YOUR REPLACEMENT?**

8 A. My replacement was responsible for managing Depoe Bay in addition to my original  
9 territory.

10 **Q. DID THAT CHANGE THE SPAN OF CONTROL, OR THE NUMBER OF**  
11 **PERSONNEL YOUR REPLACEMENT WAS TO MANAGE?**

12 A. Yes. It increased the number of employees and subscriber base for that supervisor.

13 **Q. FOR THE TERRITORY YOUR REPLACEMENT CAME FROM, DO YOU**  
14 **KNOW WHETHER THE SPAN OF CONTROL CHANGED IN ANY WAY?**

15 A. Yes. My replacement left fewer persons in his former territory to manage subscribers or  
16 employee problems.

17 **Q. AS A MANAGER, CAN YOU EXPLAIN THE PRACTICAL EFFECTS THAT**  
18 **MAY OCCUR WHEN SPAN OF CONTROL IS INCREASED?**

19 A. In my experience, any time the number of persons and territory increase; it affects the  
20 manager's ability to get things done. They will frequently be forced to deal with the  
21 immediate, not long term problems. Where the number of subscribers increases for a  
22 manager, it may also affect the manager's ability to get things done due to greater volume  
23 of subscriber and network issues.

24

25

26

1 **Q. WOULD YOU DESCRIBE THE SYSTEM OUTAGES EXPERIENCED IN**  
2 **LINCOLN AND TILLAMOOK COUNTIES AS A LONG TERM PROBLEM**  
3 **THAT MAY HAVE BEEN AFFECTED BY THE EMBARQ-CENTURYTEL**  
4 **MERGER?**

5 A. Yes, it is a long-term problem, created by Embarq. In my opinion due in part to  
6 management changes and focus on merger issues, CenturyLink has not properly  
7 addressed the network reliability in Lincoln or Tillamook Counties.

8 **Q. DO YOU HAVE CONCERNS THAT THE CENTURYLINK-QWEST MERGER**  
9 **MIGHT CAUSE FURTHER CHANGES IN SPAN OF CONTROL?**

10 A. Yes, it is a concern that further organizational changes from this merger will result in  
11 increased span of control, and failure to focus on the network deficiencies in Lincoln and  
12 Tillamook Counties.

13 **Q. DO YOU HAVE CONCERNS ABOUT THE CONDITION OF THE EQUIPMENT,**  
14 **LINES AND FIBER IN THE FORMER EMBARQ SERVICE AREA (SERVING**  
15 **LINCOLN AND TILLAMOOK COUNTIES), IN EITHER ITS AGE,**  
16 **FUNCTIONAL CONDITION OR RELIABILITY?**

17 A. Yes. Unless something is done to increase the redundancy for the communication traffic  
18 in and out of the coast the entire Tillamook and North Lincoln County area will remain  
19 vulnerable to both catastrophic and fairly common events like backhoe dig ups etc. One  
20 bad decision by an equipment operator over by Salem can and has silenced the entire  
21 Coast. This is a big problem with a simple solution. A redundant route out to the North or  
22 South would protect our communities. I fear that our Counties would face even more  
23 abandonment at the hands of the larger company than we did as Embarq. Dollars go to  
24 where the competition drives them. It was tough to compete for dollars with markets like  
25 Las Vegas and North Houston and on and on. I can just imagine what it will be like  
26 competing for capital improvement dollars with Portland, Seattle, Denver, etc.

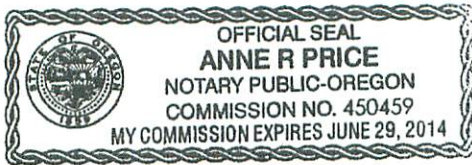
1 Q. DO YOU SUPPORT THE MERGER CONDITIONS PROPOSED BY PARKER  
2 TELECOMMUNICATIONS AS A SOLUTION TO THE NETWORK PROBLEMS  
3 YOU HAVE IDENTIFIED?

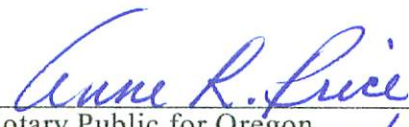
4 A. Yes.

5  
6   
Dennis Manning

7 STATE OF OREGON       )  
8                                )       ss.  
9 County of Tillamook    )

10 This instrument was signed and acknowledged before me and in my presence on  
11 this 24 day of August, 2010 by Dennis Manning.



  
Notary Public for Oregon

My Commission Expires: 6/29/14

**CERTIFICATE OF SERVICE  
UM 1484**

I certify that on August 24, 2010 I served copies of testimony filed on behalf of intervenor Parker Telecommunications in docket UM 1484, being Exhibits 100-500, on each party listed in the UM 1484 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid.

Michel Singer Nelson  
360Networks(USA) Inc  
370 Interlocken Blvd Ste 600  
Broomfield CO 80021-8015

Rhonda Kent  
Centurylink  
805 Broadway 8<sup>th</sup> Floor  
Vancouver WA 98660  
[ronda.kent@centurylink.com](mailto:ronda.kent@centurylink.com)

Penny Stanley  
360Networks(USA) Inc  
370 Interlocken Blvd Ste 600  
Broomfield CO 80021-8015  
[penny.stanley@360.net](mailto:penny.stanley@360.net)

William E Hendricks  
Centurylink, Inc.  
805 Broadway St  
Vancouver WA 98660-3277  
[tre.hendricks@centurylink.com](mailto:tre.hendricks@centurylink.com)

Arthur A Butler  
Atter Wynne LLP  
601 Union Street, Ste 1501  
Seattle WA 98101-3981  
[aab@aterwynne.com](mailto:aab@aterwynne.com)

Michael R Moore  
Charter Fiberlink OR - CCVII LLC  
12405 Powercourt Dr  
St Louis MO 63131  
[michael.moore@chartercom.com](mailto:michael.moore@chartercom.com)

Joel Paisner  
Atter Wynne LLP  
601 Union Street, Ste 1501  
Seattle WA 98101-2327  
[jrp@aterwynne.com](mailto:jrp@aterwynne.com)

Gordon Feighner  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland OR 97208  
[gordon@oregoncub.org](mailto:gordon@oregoncub.org)

Richard Stevens  
Central Telephone Inc  
PO Box 25  
Goldendale WA 98620  
[rstevens@gorge.net](mailto:rstevens@gorge.net)

Robert Jenks  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland OR 97208  
[bob@oregoncub.org](mailto:bob@oregoncub.org)

John Felz  
Century Farm Court  
5454 W 110<sup>th</sup> St KSOPKJ0502  
Overland Park KS 66211  
[john.felz@centurylink.com](mailto:john.felz@centurylink.com)

G. Catriona McCracken  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland OR 97208  
[catriona@oregoncub.org](mailto:catriona@oregoncub.org)

1  
2  
3 Raymond Myers  
Citizens' Utility Board of Oregon  
4 610 SW Broadway, Suite 400  
Portland OR 97208  
5 [ray@oregoncub.org](mailto:ray@oregoncub.org)  
6 Kevin Elliott Parks  
Citizens' Utility Board of Oregon  
7 610 SW Broadway, Suite 400  
Portland OR 97208  
8 [kevin@oregoncub.org](mailto:kevin@oregoncub.org)  
9 Marsha Spellman  
Converge Communications  
10 10425 SW Hawthorne LN  
Portland OR 97225  
11 [marsha@convergecomm.com](mailto:marsha@convergecomm.com)  
12 Frank G Patrick  
Corporate Lawyers PC  
13 PO Box 231119  
Portland OR 97281  
14 [fgplawpc@hotmail.com](mailto:fgplawpc@hotmail.com)  
15 Katherine K. Mudge  
Covad Communications Co  
16 7000 N Mopac Expwy 2<sup>nd</sup> Fl  
Austin TX 78731  
17 [kmudge@covad.com](mailto:kmudge@covad.com)  
18 K C Halm  
Davis Wright Tremaine LLP  
19 1919 Pennsylvania Ave NW 2<sup>nd</sup> Fl  
Washington DC 20006-3458  
20 [kchalm@dwt.com](mailto:kchalm@dwt.com)  
21 Gregory J. Kopta  
Davis Wright Tremaine LLP  
22 1201 Third Ave Ste 2200  
Seattle WA 98101-1688  
23 [gregkopta@dwt.com](mailto:gregkopta@dwt.com)  
24 Mark P Trinchero  
Davis Wright Tremaine LLP  
25 1300 SW Fifth Ave Ste 2300  
Portland OR 97201-5682  
26 [marktrinchero@dwt.com](mailto:marktrinchero@dwt.com)

Jason W Jones  
Department of Justice  
Regulated Utility & Business Section  
1162 Court Street NE  
Salem OR 97301-4096  
[jason.w.jones@state.or.us](mailto:jason.w.jones@state.or.us)

Edwin B Parker  
Economic Development Alliance  
PO Box 402  
Gleneden Beach OR 9788  
[edparker@teleport.com](mailto:edparker@teleport.com)

Judith Endejan  
Graham & Dunn PC  
2801 Alaskan Way, Suite 300  
Seattle WA 98121  
[jendejan@grahamdunn.com](mailto:jendejan@grahamdunn.com)

Gregory Merz  
Gray Plant Mooty  
500 IDS Center  
80 S Eighth St  
Minneapolis MN 55402  
[gregory.merz@gpmlaw.com](mailto:gregory.merz@gpmlaw.com)

Karen L. Clauson  
Integra Telecom Inc  
6160 Golden Hills Dr  
Golden Valley MN 55416-1020  
[klclauson@integratelecom.com](mailto:klclauson@integratelecom.com)

Greg L. Rogers  
Level 3 Communications LLC  
1025 Eldorado Blvd  
Broomfield CO 80021  
[greg.rogers@level3.com](mailto:greg.rogers@level3.com)

David Hawker  
City of Lincoln City  
801 Sw Highway 101  
Lincoln City or 97367  
[davidh@lincolncity.org](mailto:davidh@lincolncity.org)

Wayne Belmont  
Lincoln County Counsel  
225 W Olive Street  
Newport OR 97365

wbelmont@co.lincoln.or.us

Adam Lowney  
McDowell Rackner & Gibson PC  
419 SW 11<sup>th</sup> Ave Ste 400  
Portland OR 97205  
adam@mcd-law.com

Wendy McIndoo  
McDowell Rackner & Gibson PC  
419 SW 11<sup>th</sup> Ave Ste 400  
Portland OR 97205  
wendy@mcd-law.com

Lisa F Rackner  
McDowell Rackner & Gibson PC  
419 SW 11<sup>th</sup> Ave Ste 400  
Portland OR 97205  
lisa@mcd-law.com

Randy Linderman  
Pacific Northwest Payphone  
1315 Nw 185th Ave Ste 215  
Beaverton or 97006-1947  
rlinderman@gofirestream.com

Kelly Mutch  
PriorityOne Telecommunications Inc  
PO Box 758  
La Grande OR 97850-6462  
managers@p1tel.com

Bryan Conway  
Public Utility Commission of Oregon  
PO Box 2148  
Salem OR 97308-2148  
bryan.conway@state.or.us

Michael Dougherty  
Public Utility Commission of Oregon  
PO Box 2148  
Salem OR 97308-2148  
michael.dougherty@state.or.us

Patrick L Phipps  
QSI Consulting Inc  
3504 Sundance Dr  
Springfield IL 62711

Alex M Duarte  
QWEST Corporation  
310 SW Park Ave 11<sup>th</sup> Fl  
Portland OR 97205-3715  
alex.duarte@qwest.com

Mark Reynolds  
QWEST Corporation  
1600 7<sup>th</sup> Ave Rm 3206  
Seattle WA 98191  
mark.reynolds3@qwest.com

Diane Browning  
Sprint Communications Co LP  
3450 Sprint PKWY  
Overland Park KS 66251  
diane.c.browning@sprint.com

Kenneth Schiffman  
Sprint Communications Co LP  
3450 Sprint PKWY  
Overland Park KS 66251  
kenneth.schiffman@sprint.com

Kristin L Jacobson  
Sprint Nextel  
201 Mission St Ste 1500  
San Francisco CA 94105  
kristin.l.jacobson@sprint.com

Dave Conn  
T-Mobile USA Inc  
12920 E 38<sup>th</sup> St  
Bellevue WA 98006  
dave.conn@t-mobile.com

Lyndall Nipps  
TW Telecom of Oregon LLC  
9665 Granite Ridge Dr Ste 500  
San Diego CA 92123  
lyndall.nipps@twtelecom.com

William Sargent  
Tillamook County  
1134 Main Avenue  
Tillamook OR 97141  
wsargent@oregoncoast.com



Barbara Young  
United Telephone Company of the Northwest  
902 Wasco St ORHDRA0305  
Hood River OR 97031  
[barbara.c.young@centurylink.com](mailto:barbara.c.young@centurylink.com)

Rex M Knowles  
XO Communications Services Inc  
7050 Union Park Ave Ste 400  
Midvale UT 84047  
[rexknowles@xo.com](mailto:rexknowles@xo.com)

Adam Haas  
WSTC  
10425 SW Hawthorne LN  
Portland OR 97225  
[adamhaas@convergecomm.com](mailto:adamhaas@convergecomm.com)

DATED this 24<sup>th</sup> day of August, 2010.



Douglas R. Holbrook, OSB #872576  
Holbrook & Seifert LLC  
PO Box 2087  
Newport, OR 97365  
T 541-265-2080 F 541-265-2131  
[doug@lawbyhs.com](mailto:doug@lawbyhs.com)