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August 18, 2010

**VIA ELECTRONIC MAIL AND U.S. MAIL**

Filing Center  
Oregon Public Utility Commission  
PO Box 2148  
Salem, OR 97308-2148

Re: UM 1481 – Effect of Existing OUSF

Dear Sir/Madam:

At the last two workshops in this docket, a question was asked about whether the existing OUSF has met its purpose in reducing access charges. At least the person asking the question described the purpose of the existing OUSF as reducing access charges. To be more precise, when OECA members were added to the state universal service fund, the actual purpose for those companies was to address the carrier common line (CCL) portion of intrastate access charges. Some have viewed the CCL access element as an implicit universal service support mechanism.

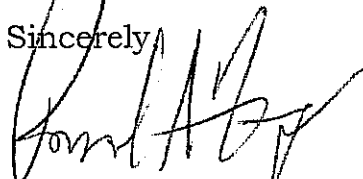
Insofar as OECA members are concerned, the Oregon universal service fund (OUSF) has met the purpose of addressing the intrastate CCL access element by reducing on a dollar-for-dollar basis member companies' intrastate CCL revenue requirement. In a very few cases, under the existing formulas adopted by the Commission, a company is entitled to receive OUSF support above and beyond the amount needed to offset its intrastate CCL revenue requirement. In those cases, the companies have further reduced access charges by reducing billing and collection or special access revenue requirements, or both, or have reduced extended area service rates.

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Insofar as non-OECA members are concerned, it is OECA's understanding that support from the OUSF has been used by those companies to reduce business rates. Again, some have viewed the differential between residential and business rates as an implicit subsidy for universal service purposes.

Thus, it is clear that the existing OUSF has, and is, fulfilling its purpose.

Sincerely,



RICHARD A. FINNIGAN

RAF/km

cc: Service List (via U.S. mail)  
Member Companies (via e-mail)  
Brant Wolf (via e-mail)

CERTIFICATE OF SERVICE

UM 1481

I hereby certify that I served the attached letter to the Filing Center upon all parties of record in this proceeding by U.S. mail and electronic mail, pursuant to OAR 860-013-0070, unless otherwise specified, to the following parties or attorneys of parties:

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Dated at Olympia, WA this 18th day of August, 2010.

By:   
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