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March 3, 2011

VIA E-MAIL AND U.S. MAIL

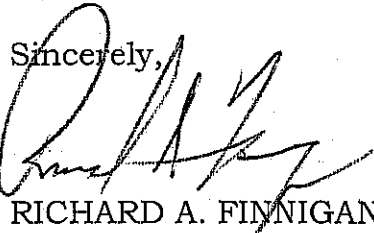
Filing Center
Oregon Public Utility Commission
550 Capitol Street NE Suite 215
Salem, OR 97301-2551

Re: UM 1481 – Memorandum in Support of Joint Motion for
Reconsideration and Stay of Order No. 10-496

Dear Sir/Madam:

Enclosed are the original and one copy of a Memorandum in Support of
Joint Motion for Reconsideration and Stay of Order No. 10-496 on behalf of the
Oregon Telecommunications Association.

Thank you for your attention to this matter.

Sincerely,

RICHARD A. FINNIGAN

RAF/km
Enclosures

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

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1481

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON

Staff investigation of the Oregon Universal
Service Fund.

MEMORANDUM IN SUPPORT OF JOINT
MOTION FOR RECONSIDERATION AND
STAY OF ORDER NO. 10-496

On February 22, 2011, Qwest Corporation (Qwest) and Frontier Communications Northwest Inc. (Frontier) filed a Joint Motion for Reconsideration and Stay of Order No. 10-496. Responses to that Motion are due on or before March 9, 2011.

The Oregon Telecommunications Association (OTA) hereby files this Memorandum in response to the Joint Motion.¹ OTA fully supports the Joint Motion.

In the Joint Motion, Qwest and Frontier provide very strong support for a conclusion that Order No. 10-496 be reconsidered. At the core of the Motion is the fact that the proceedings in this docket to date have not been evidentiary in nature. The parties have not presented evidence as to specific facts. To date, the docket has been a policy development docket as opposed to an

¹ In the interest of full disclosure, OTA notes that Frontier is a member of OTA.

1 evidentiary docket. On that basis, there is no record which exists that would support the
2 Commission making findings and conclusions that relate to how Qwest and Frontier interface with
3 the Oregon universal service fund.

4 OTA respectfully requests that the Commission issue an order granting reconsideration as
5 set out by Qwest and Frontier in their Joint Motion.

6 Respectfully submitted this 3rd day of March, 2011.

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9 By: 

10 RICHARD A. FINNIGAN, OSB No. 965357
11 Attorney for the Oregon Telecommunications
12 Association

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26 MEMORANDUM IN SUPPORT OF JOINT
MOTION FOR RECONSIDERATION AND
STAY OF ORDER NO. 10-496 - 2

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CERTIFICATE OF SERVICE
UM 1481

I certify that I sent the attached Memorandum in Support of Joint Motion for Reconsideration and Stay of Order No. 10-496 by electronic mail and U.S. mail to the following:

FILING CENTER
PUBLIC UTILITY COMMISSION OF OREGON
550 CAPITOL STREET NE SUITE 215
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I hereby certify that I served the attached Memorandum in Support of Joint Motion for Reconsideration and Stay of Order No. 10-496 upon all parties of record in this proceeding by electronic mail, pursuant to OAR 860-013-0070, to the following parties or attorneys of parties:

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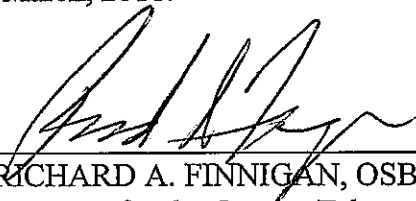
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Dated at Olympia, WA this 3rd day of March, 2011.

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