

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, Washington 98512
Fax (360) 587-3852

Richard A. Finnigan
(360) 956-7001
rickfinn@localaccess.com

Kathy McCrary, Paralegal
(360) 753-7012
kathym@localaccess.com

August 17, 2010

VIA ELECTRONIC MAIL AND U.S. MAIL

Roger White, Program Manager
Public Utility Commission Of Oregon
PO Box 2148
Salem, OR 97308

Re: UM 1481 – Major Points - OTA Draft Legislation

Dear Roger:

Pursuant to the discussion that occurred at the Workshop on August 12, 2010, the following are the major points in the OTA Draft Legislation. These points are offered not as points of debate concerning OTA's Draft Legislation, but as possible issues that parties may want to consider when discussing universal service fund issues in general.

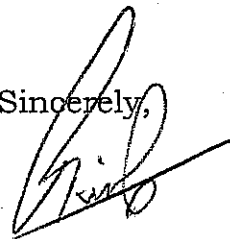
The major points are as follows:

- Contribution Base - Changes contribution base from retail revenue to working telephone numbers or replacement protocol and allows the Commission to include capacity/connection charges after transition period
- Broadens the contribution base to include all of those that use working telephone numbers
- Expands Commission jurisdiction over contributors as it specifically relates to universal service fund issues
- Establishes standards for non-ILECs that may be designated as ETCs - includes COLR responsibilities

- Provides a transition of intrastate access rate levels to interstate access rate levels over three years with support from the universal service fund
- Establishes as a condition for drawing from the fund that a carrier must offer (or submit a plan that within four years the carrier can offer) broadband service at speeds determined by the Commission to at least ninety percent of the households in the area for which it is designated as an ETC
- Instructs the Commission to establish call signaling rules to address phantom traffic
- Establishes a transition period to transition existing USF to broadband fund. The details of the broadband fund are left to the Commission to determine
- Limits the ability to designate ETCs to one wireline and one wireless per area - can decide not to designate any carrier for a particular area

As we stated at the Workshop, the OTA Draft Legislation may, and probably will, change before it is finally submitted. However, the above are the major points in the existing draft.

Sincerely,



RICHARD A. FINNIGAN

RAF/km
Enclosure

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 Roger White 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:

CHARLES L. BEST
1631 NE BROADWAY #538
PORTLAND, OR 97232-1425
chuck@charleslbest.com
VIA E-MAIL ONLY

CYNTHIA MANHEIM
AT&T
PO BOX 97061
REDMOND, WA 98052
cindy.manheim@att.com
VIA E-MAIL ONLY

DAVID COLLIER
AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST INC.
645 E PLUMB LN
PO BOX 11010
RENO, NV 89502
david.collier@att.com
VIA E-MAIL ONLY

SHARON L. MULLIN
AT&T SERVICES, INC.
DIRECTOR-EXTERNAL AFFAIRS
400 W 15TH ST, STE 930
AUSTIN, TX 78701
slmullin@att.com
VIA E-MAIL ONLY

GORDON FEIGHNER, ENERGY
ANALYST
CITIZENS' UTILITY BOARD OF OR
610 SW BROADWAY, SUITE 400
PORTLAND, OR 97205
gordon@oregoncub.org
VIA E-MAIL ONLY

ROBERT JENKS, EXECUTIVE
DIRECTOR
CITIZENS' UTILITY BOARD OF OR
610 SW BROADWAY, SUITE 400
PORTLAND, OR 97205
bob@oregoncub.org
VIA E-MAIL ONLY

G. CATRIONA MCCrackEN
LEGAL COUNSEL/STAFF ATTY
CITIZENS' UTILITY BOARD OF OR
610 SW BROADWAY, SUITE 400
PORTLAND, OR 97205
catriona@oregoncub.org
VIA E-MAIL ONLY

RAYMOND MYERS, ATTORNEY
CITIZENS' UTILITY BOARD OF OR
610 SW BROADWAY, SUITE 400
PORTLAND, OR 97205
ray@oregoncub.org
VIA E-MAIL ONLY

1
2 KEVIN ELLIOTT PARKS, STAFF
3 ATTORNEY
4 CITIZENS' UTILITY BOARD OF OR
5 610 SW BROADWAY, SUITE 400
6 PORTLAND, OR 97205
7 kevin@oregoncub.org
8 **VIA E-MAIL ONLY**

MICHAEL T. WEIRICH, ASSISTANT
ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS
SECTION
1162 COURT ST NE
SALEM, OR 97301-4096
michael.weirich@doj.state.or.us

7 ROGER WHITE, PROGRAM MANAGER
8 PUBLIC UTILITY COMMISSION OF
9 OREGON
10 PO BOX 2148
11 SALEM, OR 97308
12 roger.white@state.or.us

ARTHUR BUTLER
ATER WYNNE LLP
601 UNION STREET, STE 1501
SEATTLE, WA 98101-3981
aab@aterwynne.com
VIA E-MAIL ONLY

11 ROGER T. DUNAWAY
12 ATER WYNNE LLP
13 601 UNION STREET, STE 1501
14 SEATTLE, WA 98101-3981
15 rtd@aterwynne.com
16 **VIA E-MAIL ONLY**

JACK PHILLIPS
FRONTIER COMMUNICATIONS OF
AMERICA
14450 BURNHAVEN DRIVE
BURNSVILLE, MN 55306
Jack.phillips@frontiercorp.com
VIA E-MAIL ONLY

15 INGO HENNINGSEN
16 MANAGER, GOVERNMENT &
17 EXTERNAL AFFAIRS
18 FRONTIER COMMUNICATIONS OF
19 AMERICA INC.
20 4064 LISA DRIVE
21 SALT LAKE CITY, UT 84124-2118
22 ingo.henningsen@frontiercorp.com
23 **VIA E-MAIL ONLY**

ADAM L. SHERR
QWEST CORPORATION
1600 7TH AVENUE, ROOM 1506
SEATTLE, WA 98191
adam.sherr@qwest.com

21 MARK REYNOLDS
22 QWEST CORPORATION
23 1600 7TH AVE ROOM 3206
24 SEATTLE, WA 98191
25 mark.reynolds3@qwest.com

WILLIAM E. HENDRICKS
CENTURYLINK, INC.
805 BROADWAY ST
VANCOUVER, WA 98660-3277
tre.hendricks@centurylink.com
VIA E-MAIL ONLY

26 CERTIFICATE OF SERVICE - 2

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, WA 98512
(360) 956-7001

1
2 DOUG COOLEY
3 GOVERNMENT AFFAIRS MANAGER
4 COMCAST BUSINESS
5 COMMUNICATIONS LLC
6 1710 SALEM INDUSTRIAL DRIVE NE
7 SALEM, OR 97303
8 doug_cooley@cable.comcast.com

9 MARK TRINCHERO
10 DAVIS WRIGHT TREMAINE LLP
11 1300 SW FIFTH AVE STE 2300
12 PORTLAND, OR 97201-5682
13 marktrincher@dwt.com

14 RENEE WILLER, EXTERNAL AFFAIRS
15 MANAGER
16 FRONTIER COMMUNICATIONS OF
17 AMERICA
18 20575 NW VON NEUMANN DR
19 BEAVERTON, OR 97006-6982
20 renee.willer@ftr.com
21 **VIA E-MAIL ONLY**

22 CARSTEN KOLDSBAEK
23 CONSULTING MANAGER
24 GVNW INC.
25 8050 SW WARM SPRINGS - STE 200
26 TUALATIN, OR 97062
ckoldsbaek@gvnw.com

THEODORE N. GILLIAM
SENIOR CORPORATE COUNSEL
INTEGRA TELECOM, INC.
1201 NE LLOYD BLVD STE 500
PORTLAND, OR 97232
tgilliam@integratelecom.com
VIA E-MAIL ONLY

MARSHA SPELLMAN
CONVERGE COMMUNICATIONS
10425 SW HAWTHORNE LN
PORTLAND, OR 97225
marsha@convergecomm.com

BARBARA YOUNG
EMBARQ COMMUNICATIONS INC.
902 WASCO ST - ORHDRA0305
HOOD RIVER, OR 97031-3105
barbara.c.young@centurylink.com
VIA E-MAIL ONLY

JEFFRY H. SMITH
VICE PRESIDENT & DIVISION
MANAGER
GVNW CONSULTING INC.
8050 SW WARM SPRINGS - STE 200
TUALATIN, OR 97062
jsmith@gvnw.com

DOUGLAS K. DENNEY
INTEGRA TELECOM OF OREGON INC.
6160 GOLDEN HILLS DR
GOLDEN VALLEY, MN 55416-1020
dkdenney@integratelecom.com
VIA E-MAIL ONLY

MICHAEL DEWEY
EXECUTIVE DIRECTOR
OREGON CABLE AND
TELECOMMUNICATIONS ASSN
1249 COMMERCIAL ST SE
SALEM, OR 97302
mdewey@oregoncable.com

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


MILT H. DOUMIT, DIRECTOR -
STATE GOVT RELATIONS
VERIZON
410 - 11TH AVE SE, STE 103
OLYMPIA, WA 98501
milt.h.doumit@verizon.com

THOMAS F. DIXON
ASST GENERAL COUNSEL
VERIZON CORPORATE SERVICES
707 17TH ST #4200
DENVER, CO 80202
thomas.f.dixon@verizon.com

ADAM HAAS
WSTC
10425 SW HAWTHORNE LN
PORTLAND, OR 97225
adamhaas@convergecomm.com

CRAIG PHILLIPS
OREGON EXCHANGE CARRIER ASSN
800 C ST
VANCOUVER, WA 98660
cphillips@oeca.com

Dated at Olympia, WA this 17th day of August, 2010.

By: 
RICHARD A. FINNIGAN, OSB No. 965357
Attorney for the Oregon Telecommunications
Association