

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DOCKET NO. UM 1017

In the Matter of

The Investigation Into Expansion of the Oregon Universal Service Fund to Include the Service Areas of Rural Telecommunications Carriers.

JOINT MOTION TO MODIFY THE
SCHEDULE

Pursuant to OAR 860-001-0420, Comcast Business Communications LLC (“Comcast”), tw telecom of oregon llc (“tw”), TRACER Oregon (“Tracer”), the Oregon Exchange Carrier Association (“OECA”), and Citizens’ Utility Board of Oregon (“CUB”) move to amend the schedule to allow briefing by the parties and a determination by the Oregon Public Utility Commission (“Commission”) on whether the Commission currently has legal authority to adopt the OECA’s proposed expansion of the Oregon Universal Service Fund. The modified schedule proposed herein is as follows:

September 8, 2011	Opening brief by OECA due on issue of Commission’s authority.
September 22, 2011	Responsive briefs by all other parties and Staff due on issue of Commission’s authority.
September 27, 2011	Reply brief by OECA due, on issue of Commission’s authority.
October 24, 2011	Responsive testimony tentatively due, only if the Commission has made a determination that it has the authority to adopt OECA’s proposal.
November 14, 2011	Reply to responsive testimony tentatively due, subject to timing and substance of the Commission’s determination on its the authority to adopt OECA’s proposal.
TBD, week of December 5, 2011	Hearing, again subject to timing and substance of the Commission’s determination on its authority to adopt OECA’s proposal.

In compliance with OAR 860-001-0420(3), the schedule proposed herein was discussed at the workshop held on August 16, 2011 and appeared acceptable to all parties, albeit reluctantly to OECA, at that time.

Dated: August 26, 2011

DAVIS WRIGHT TREMAINE LLP

LAW OFFICE OF RICHARD A. FINNIGAN

ALAN J. GALLOWAY, OSB #083290
MARK P. TRINCHERO, OSB #883221
Email: alangalloway@dwt.com
marktrinchero@dwt.com
Telephone: (503) 241-2300
Of Attorneys for Comcast and tw telecom

RICHARD A. FINNIGAN
Email: rickfinn@localaccess.com
Telephone: (360) 956-7001
Of Attorneys for the Oregon Exchange
Carrier Association

ATER WYNNE LLP

CITIZENS' UTILITY BOARD OF OREGON

ARTHUR A. BUTLER, *pro hac vice*
Email: aab@aterwynne.com
Telephone: (206) 623-4711
Of Attorneys for TRACER Oregon

RAY MYERS
Email: ray@oregoncub.org
Telephone: (503) 227-1984
Staff Attorney
Citizens' Utility Board of Oregon

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DOCKET NO. UM 1017

In the Matter of

The Investigation Into Expansion of the Oregon Universal Service Fund to Include the Service Areas of Rural Telecommunications Carriers.

JOINT MOTION TO MODIFY THE
SCHEDULE


Pursuant to OAR 860-001-0420, Comcast Business Communications LLC (“Comcast”), tw telecom of oregon llc (“tw”), TRACER Oregon (“Tracer”), the Oregon Exchange Carrier Association (“OECA”), and Citizens’ Utility Board of Oregon (“CUB”) move to amend the schedule to allow briefing by the parties and a determination by the Oregon Public Utility Commission (“Commission”) on whether the Commission currently has legal authority to adopt the OECA’s proposed expansion of the Oregon Universal Service Fund. The modified schedule proposed herein is as follows:

September 8, 2011	Opening brief by OECA due on issue of Commission’s authority.
September 22, 2011	Responsive briefs by all other parties and Staff due on issue of Commission’s authority.
September 27, 2011	Reply brief by OECA due, on issue of Commission’s authority.
October 24, 2011	Responsive testimony tentatively due, only if the Commission has made a determination that it has the authority to adopt OECA’s proposal.
November 14, 2011	Reply to responsive testimony tentatively due, subject to timing and substance of the Commission’s determination on its the authority to adopt OECA’s proposal.
TBD, week of December 5, 2011	Hearing, again subject to timing and substance of the Commission’s determination on its authority to adopt OECA’s proposal.

In compliance with OAR 860-001-0420(3), the schedule proposed herein was discussed at the workshop held on August 16, 2011 and appeared acceptable to all parties, albeit reluctantly to OECA, at that time.

Dated: August 26, 2011

DAVIS WRIGHT TREMAINE LLP


ALAN J. GALLOWAY, OSB #083290
MARK P. TRINCHERO, OSB #883221
Email: alangalloway@dwt.com
marktrincherodwt.com
Telephone: (503) 241-2300
Of Attorneys for Comcast and tw telecom

LAW OFFICE OF RICHARD A. FINNIGAN

RICHARD A. FINNIGAN
Email: rickfinn@localaccess.com
Telephone: (360) 956-7001
Of Attorneys for the Oregon Exchange
Carrier Association

ATER WYNNE LLP

ARTHUR A. BUTLER, *pro hac vice*
Email: aab@aterwynne.com
Telephone: (206) 623-4711
Of Attorneys for TRACER Oregon

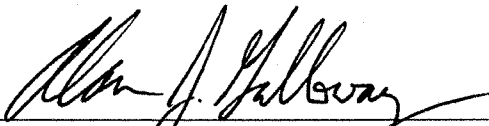
CITIZENS' UTILITY BOARD OF OREGON

RAY MYERS
Email: ray@oregoncub.org
Telephone: (503) 227-1984
Staff Attorney
Citizens' Utility Board of Oregon

In compliance with OAR 860-001-0420(3), the schedule proposed herein was discussed at the workshop held on August 16, 2011 and appeared acceptable to all parties, albeit reluctantly to OECA, at that time.

Dated: August 26, 2011

DAVIS WRIGHT TREMAINE LLP


ALAN J. GALLOWAY, OSB #083290
MARK P. TRINCHERO, OSB #883221
Email: alangalloway@dwt.com
marktrinchero@dwt.com
Telephone: (503) 241-2300
Of Attorneys for Comcast and tw telecom

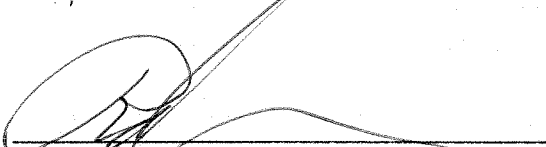
LAW OFFICE OF RICHARD A. FINNIGAN

RICHARD A. FINNIGAN
Email: rickfinn@localaccess.com
Telephone: (360) 956-7001
Of Attorneys for the Oregon Exchange
Carrier Association

ATER WYNNE LLP

ARTHUR A. BUTLER, *pro hac vice*
Email: aab@aterwynne.com
Telephone: (206) 623-4711
Of Attorneys for TRACER Oregon

CITIZENS' UTILITY BOARD OF OREGON

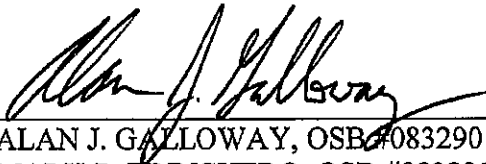


RAY MYERS
Email: ray@oregoncub.org
Telephone: (503) 227-1984
Staff Attorney
Citizens' Utility Board of Oregon

In compliance with OAR 860-001-0420(3), the schedule proposed herein was discussed at the workshop held on August 16, 2011 and appeared acceptable to all parties, albeit reluctantly to OECA, at that time.

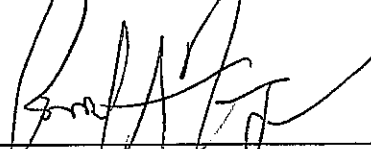
Dated: August 26, 2011

DAVIS WRIGHT TREMAINE LLP



ALAN J. GALLOWAY, OSB #083290
MARK P. TRINCHERO, OSB #883221
Email: alangalloway@dwt.com
marktrincherodwt.com
Telephone: (503) 241-2300
Of Attorneys for Comcast and tw telecom

LAW OFFICE OF RICHARD A. FINNIGAN



RICHARD A. FINNIGAN
Email: rickfinn@localaccess.com
Telephone: (360) 956-7001
Of Attorneys for the Oregon Exchange
Carrier Association

ATER WYNNE LLP

ARTHUR A. BUTLER, *pro hac vice*
Email: aab@aterwynne.com
Telephone: (206) 623-4711
Of Attorneys for TRACER Oregon

CITIZENS' UTILITY BOARD OF OREGON

RAY MYERS
Email: ray@oregoncub.org
Telephone: (503) 227-1984
Staff Attorney
Citizens' Utility Board of Oregon

In compliance with OAR 860-001-0420(3), the schedule proposed herein was discussed at the workshop held on August 16, 2011 and appeared acceptable to all parties, albeit reluctantly to OECA, at that time.

Dated: August 26, 2011

DAVIS WRIGHT TREMAINE LLP



ALAN J. GALLOWAY, OSB #083290
MARK P. TRINCHERO, OSB #883221
Email: alangualloway@dwt.com
marktrinchero@dwt.com
Telephone: (503) 241-2300
Of Attorneys for Comcast and tw telecom

LAW OFFICE OF RICHARD A. FINNIGAN

RICHARD A. FINNIGAN
Email: rickfinn@localaccess.com
Telephone: (360) 956-7001
Of Attorneys for the Oregon Exchange
Carrier Association

ATER WYNNE LLP



ARTHUR A. BUTLER, *pro hac vice*
Email: aab@aterwynne.com
Telephone: (206) 623-4711
Of Attorneys for TRACER Oregon

CITIZENS' UTILITY BOARD OF OREGON

RAY MYERS
Email: ray@oregoncub.org
Telephone: (503) 227-1984
Staff Attorney
Citizens' Utility Board of Oregon

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DOCKET NO. UM 1017

In the Matter of

The Investigation Into Expansion of the Oregon Universal Service Fund to Include the Service Areas of Rural Telecommunications Carriers.

JOINT MOTION TO MODIFY THE
SCHEDULE


Pursuant to OAR 860-001-0420, Comcast Business Communications LLC (“Comcast”), tw telecom of oregon llc (“tw”), TRACER Oregon (“Tracer”), the Oregon Exchange Carrier Association (“OECA”), and Citizens’ Utility Board of Oregon (“CUB”) move to amend the schedule to allow briefing by the parties and a determination by the Oregon Public Utility Commission (“Commission”) on whether the Commission currently has legal authority to adopt the OECA’s proposed expansion of the Oregon Universal Service Fund. The modified schedule proposed herein is as follows:

September 8, 2011	Opening brief by OECA due on issue of Commission’s authority.
September 22, 2011	Responsive briefs by all other parties and Staff due on issue of Commission’s authority.
September 27, 2011	Reply brief by OECA due, on issue of Commission’s authority.
October 24, 2011	Responsive testimony tentatively due, only if the Commission has made a determination that it has the authority to adopt OECA’s proposal.
November 14, 2011	Reply to responsive testimony tentatively due, subject to timing and substance of the Commission’s determination on its the authority to adopt OECA’s proposal.
TBD, week of December 5, 2011	Hearing, again subject to timing and substance of the Commission’s determination on its authority to adopt OECA’s proposal.

In compliance with OAR 860-001-0420(3), the schedule proposed herein was discussed at the workshop held on August 16, 2011 and appeared acceptable to all parties, albeit reluctantly to OECA, at that time.

Dated: August 26, 2011

DAVIS WRIGHT TREMAINE LLP


ALAN J. GALLOWAY, OSB #083290
MARK P. TRINCHERO, OSB #883221
Email: alangalloway@dwt.com
marktrincherodwt.com
Telephone: (503) 241-2300
Of Attorneys for Comcast and tw telecom

LAW OFFICE OF RICHARD A. FINNIGAN

RICHARD A. FINNIGAN
Email: rickfinn@localaccess.com
Telephone: (360) 956-7001
Of Attorneys for the Oregon Exchange
Carrier Association

ATER WYNNE LLP

ARTHUR A. BUTLER, *pro hac vice*
Email: aab@aterwynne.com
Telephone: (206) 623-4711
Of Attorneys for TRACER Oregon

CITIZENS' UTILITY BOARD OF OREGON

RAY MYERS
Email: ray@oregoncub.org
Telephone: (503) 227-1984
Staff Attorney
Citizens' Utility Board of Oregon

In compliance with OAR 860-001-0420(3), the schedule proposed herein was discussed at the workshop held on August 16, 2011 and appeared acceptable to all parties, albeit reluctantly to OECA, at that time.

Dated: August 26, 2011

DAVIS WRIGHT TREMAINE LLP



ALAN J. GALLOWAY, OSB #083290
MARK P. TRINCHERO, OSB #883221
Email: alangalloway@dwt.com
marktrinchero@dwt.com
Telephone: (503) 241-2300
Of Attorneys for Comcast and tw telecom

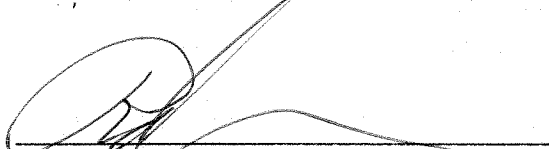
LAW OFFICE OF RICHARD A. FINNIGAN

RICHARD A. FINNIGAN
Email: rickfinn@localaccess.com
Telephone: (360) 956-7001
Of Attorneys for the Oregon Exchange
Carrier Association

ATER WYNNE LLP

ARTHUR A. BUTLER, *pro hac vice*
Email: aab@aterwynne.com
Telephone: (206) 623-4711
Of Attorneys for TRACER Oregon

CITIZENS' UTILITY BOARD OF OREGON

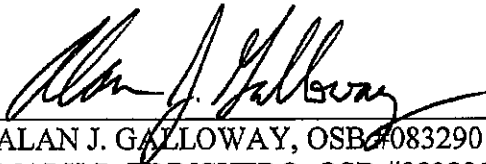


RAY MYERS
Email: ray@oregoncub.org
Telephone: (503) 227-1984
Staff Attorney
Citizens' Utility Board of Oregon

In compliance with OAR 860-001-0420(3), the schedule proposed herein was discussed at the workshop held on August 16, 2011 and appeared acceptable to all parties, albeit reluctantly to OECA, at that time.

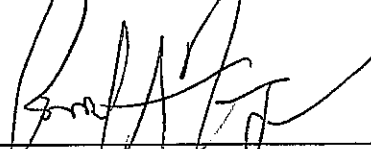
Dated: August 26, 2011

DAVIS WRIGHT TREMAINE LLP



ALAN J. GALLOWAY, OSB #083290
MARK P. TRINCHERO, OSB #883221
Email: alangalloway@dwt.com
marktrincherodwt.com
Telephone: (503) 241-2300
Of Attorneys for Comcast and tw telecom

LAW OFFICE OF RICHARD A. FINNIGAN



RICHARD A. FINNIGAN
Email: rickfinn@localaccess.com
Telephone: (360) 956-7001
Of Attorneys for the Oregon Exchange
Carrier Association

ATER WYNNE LLP

ARTHUR A. BUTLER, *pro hac vice*
Email: aab@aterwynne.com
Telephone: (206) 623-4711
Of Attorneys for TRACER Oregon

CITIZENS' UTILITY BOARD OF OREGON

RAY MYERS
Email: ray@oregoncub.org
Telephone: (503) 227-1984
Staff Attorney
Citizens' Utility Board of Oregon

In compliance with OAR 860-001-0420(3), the schedule proposed herein was discussed at the workshop held on August 16, 2011 and appeared acceptable to all parties, albeit reluctantly to OECA, at that time.

Dated: August 26, 2011

DAVIS WRIGHT TREMAINE LLP



ALAN J. GALLOWAY, OSB #083290
MARK P. TRINCHERO, OSB #883221
Email: alangalloway@dwt.com
marktrinchero@dwt.com
Telephone: (503) 241-2300
Of Attorneys for Comcast and tw telecom

LAW OFFICE OF RICHARD A. FINNIGAN

RICHARD A. FINNIGAN
Email: rickfinn@localaccess.com
Telephone: (360) 956-7001
Of Attorneys for the Oregon Exchange
Carrier Association

ATER WYNNE LLP



ARTHUR A. BUTLER, *pro hac vice*
Email: aab@aterwynne.com
Telephone: (206) 623-4711
Of Attorneys for TRACER Oregon

CITIZENS' UTILITY BOARD OF OREGON

RAY MYERS
Email: ray@oregoncub.org
Telephone: (503) 227-1984
Staff Attorney
Citizens' Utility Board of Oregon

**CERTIFICATE OF SERVICE
UM 1017**

I hereby certify that, on August 26, 2011, JOINT MOTION TO MODIFY THE SCHEDULE was served on the following persons by email to all parties and by U.S. Mail to parties who have not waived paper service:

<p>Charles L. Best Attorney at Law 1631 NE Broadway #538 Portland OR 97232-1425 chuck@charleslbest.com</p>	<p>AT&T Cynthia Manheim PO Box 97061 Redmond, WA 98052 cindy.manheim@att.com</p>
<p>AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST INC. David Collier 645 E Plumb Ln PO Box 11010 Reno, NV 89502 david.collier@att.com</p>	<p>AT&T SERVICES, INC. Sharon L. Mullin Director-External Affairs 400 W 15th St Ste 930 Austin, TX 78701 simullin@att.com</p>
<p>ATER WYNNE LP Arthur A. Butler 601 Union Street Ste 1501 Seattle, WA 98101-3981 aab@aterwynne.com</p>	<p>ATER WYNNE LP Joel Paisner 601 Union Street Ste 1501 Seattle, WA 98101-2327 jrp@aterwynne.com</p>
<p>CENTURY LINK INC William E. Hendricks 805 Broadway St, Ste. 400 Vancouver, WA 98660-3277 Tre.hendricks@centurylink.com</p>	<p>CITIZENS' UTILITY BOARD OF OREGON Robert Jenks, Executive Director 610 SW Broadway, Suite 308 Portland, OR 97205 bob@oregoncub.org</p>
<p>CITIZENS' UTILITY BOARD OF OREGON G. Catriona McCracken, Legal Counsel/Staff Attorney 610 SW Broadway, Suite 308 Portland, OR 97205 catriona@oregoncub.org</p>	<p>CITIZENS' UTILITY BOARD OF OREGON Raymond Myers, Attorney 610 SW Broadway, Suite 308 Portland, OR 97205 ray@oregoncub.org</p>
<p>COMCAST BUSINESS COMMUNICATIONS LLC Doug Cooley Government Affairs Manager 1710 Salem Industrial Drive NE Salem, OR 97303 doug_cooley@cable.comcast.com</p>	<p>COMSPAN COMMUNICATIONS INC Tim Spannring Operations Manager 278 NW Garden Valley Blvd Roseburg, OR 97470 tims@comspancomm.com</p>

<p>EMBARQ COMMUNICATIONS INC Nancy Judy, State Exec 902 Wasco St A0412 Hood River, OR 97031 barbara.c.young@centurylink.com</p>	<p>FRONTIER COMMUNICATIONS NORTHWEST INC. Renee Willer External Affairs Manager 20575 NW Von Neumann Dr Beaverton, OR 97006-6982 renee.willer@ftr.com</p>
<p>FRONTIER COMMUNICATIONS Phyllis Whitten Attorney at Law 9260 E Stockton Blvd Elk Grove, CA 95624 phyllis.whitten@ftr.com</p>	<p>GVNW CONSULTING INC Carsten Koldsbaek, Consulting Manager PO Box 2330 Tualatin, OR 97062 ckoldsbaek@gvnw.com</p>
<p>GVNW CONSULTING INC Jim Rennard, Consulting Manager PO Box 2330 Tualatin, OR 97062 jrennard@gvnw.com</p>	<p>GVNW CONSULTING INC Jeffrey H. Smith Vice President & General Manager PO Box 2330 Tualatin, OR 97062 jsmith@gvnw.com</p>
<p>LAW OFFICE OF RICHARD A. FINNIGAN Richard A. Finnigan 2112 Black Lake Blvd SW Olympia, WA 98512 rickfinn@localaccess.com</p>	<p>McDOWELL RACKNER & GIBSON PC Adam Lowney 419 SW 11th Ave Ste 400 Portland, OR 97205 adam@mcd-law.com</p>
<p>McDOWELL RACKNER & GIBSON PC Lisa F. Rackner 419 SW 11th Ave Ste 400 Portland, OR 97205 lisa@mcd-law.com</p>	<p>OCTA Michael Dewey Executive Director 1249 Commercial St SE Salem, OR 97302 mdewey@oregoncable.com</p>
<p>OREGON EXCHANGE CARRIER ASSN Craig Phillips 800 C St Vancouver, WA 98660 cphillips@oeqa.com</p>	<p>OREGON TELECOMMUNICATIONS ASSN Brant Wolf Executive Vice President 777 13th St SE Ste 120 Salem, OR 97301-4038 bwolf@ota-telecom.org</p>
<p>PUBLIC UTILITY COMMISSION OF OREGON Roger White Program Manager PO Box 2148 Salem, OR 97308 roger.white@state.or.us</p>	<p>PUC STAFF – DEPARTMENT OF JUSTICE Michael T. Weirich Assistant Attorney General Business Activities Section 1162 Court St NE Salem, OR 97301-4096 michael.weirich@doj.state.or.us</p>

<p>QWEST CORPORATION Mark Reynolds 1600 7th Ave, Rm 3206 Seattle, WA 98191 mark.reynolds3@qwest.com</p>	<p>QWEST CORPORATION Ron L. Trullinger 310 SW Park Ave, #11 Portland, OR 97205 ron.trullinger@centurylink.com</p>
<p>TW TELECOM OF OREGON LLC Lyndall Nipps Vice President, Regulatory Affairs 9665 Granite Ridge Dr., Ste 500 San Diego, CA 92123 lyndall.nipps@twtelecom.com</p>	<p>VERIZON BUSINESS Richard B. Severy Assistant General Counsel 2775 Mitchell Dr., Bldg 8-2 Walnut Creek, CA 94598 richard.b.severy@verizonbusiness.com</p>
<p>VERIZON COMMUNICATIONS NORTHWEST INC Milt H. Doumit Director, State Govt. Relations 410 – 11th Ave SE, Ste. 103 Olympia, WA 98501 milt.h.doumit@verizon.com</p>	<p>VERIZON CORPORATE COUNSEL Rudolph M. Reyes 201 Spear Street., 7th Floor San Francisco, CA 94105 rudy.reyes@verizon.com</p>
<p>WARM SPRINGS TELECOMMUNICATIONS Marsha Spellman 10425 SW Hawthorne Ln. Portland, OR 97225 marsha.spellman@warmspringstelecom.com</p>	<p>WSTC Adam Haas 10425 SW Hawthorne Ln. Portland, OR 97225 adam.haas@warmspringstelecom.com</p>

Alan J. Galloway, Davis Wright Tremaine, LLP
1300 SW 5th Avenue, Suite 2300, Portland, OR 97201