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September 21, 2012

VIA E-MAIL AND U.S. MAIL

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

Re: UM 1481 – Motion

Dear Sir/Madam:

Enclosed is the Motion to Adopt Procedural Schedule, Issue Standard Protective Order and Cancel Prehearing Conference. This is a joint motion of the Oregon Telecommunications Association, Comcast Phone of Oregon LLC, tw telecom of oregon llc and Commission Staff.

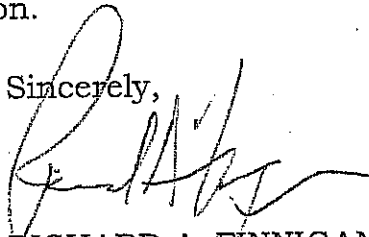
The motion has previously been distributed to the service list to see if there were any objections. While the window for notifying me of objections was small, no objections have been received. Based upon the exchange of emails among the parties that occurred earlier this week, it is the belief among the moving parties that there are no objections to the motion from the other parties.

Please address any questions concerning this matter to the undersigned or Mr. Mark Trincherro or Mr. Jason Jones (or all three of us).

Filing Center
September 21, 2012
Page 2 of 2

Thank you for your consideration of this motion. I do apologize for the shortness of time for the filing of this Motion.

Sincerely,



RICHARD A. FINNIGAN

RAF/cs
Enclosures

cc: Service List (via e-mail)

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6 BEFORE THE PUBLIC UTILITY COMMISSION
7 OF OREGON

8 UM 1481 (Phase II)

9 In the Matter of

10 PUBLIC UTILITY COMMISSION OF
11 OREGON

12 Staff investigation of the Oregon Universal
13 Service Fund.

MOTION TO ADOPT PROCEDURAL
SCHEDULE, ISSUE STANDARD
PROTECTIVE ORDER AND CANCEL
PREHEARING CONFERENCE

14 This Motion is filed jointly by the Oregon Telecommunications Association, Comcast Phone of
15 Oregon LLC, tw telecom of oregon llc, and the Commission Staff (the Moving Parties). The purpose for
16 this motion is to do three things. First, to provide a consensus schedule for consideration for adoption.
17 Second, to request that the Commission issue a standard protective order in this matter. Third, to request
18 that the prehearing conference scheduled for September 24, 2012, be cancelled.

19 BASIS FOR MOTION

20 All of the parties have exchanged numerous e-mails during the course of this past week. A thank
21 you is owed to Commission Staff for taking the lead in proposing a schedule. That proposal spurred the
22 parties to actively engage in an e-mail dialogue that led to the parties being able to arrive at a consensus
23 schedule.
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26 MOTION FOR ADOPT PROCEDURAL
SCHEDULE, ISSUE STANDARD
PROTECTIVE ORDER AND CANCEL
PREHEARING CONFERENCE - 1

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1 In making this statement, the Moving Parties are asserting that they believe that all other parties
2 do, in fact, concur. This belief is based upon the exchange of e-mails among the parties that have
3 occurred over the course of this past week. The proposed schedule is as follows:

4 Event	Date
5 Staff and Parties Opening Testimony	November 16, 2012
6 Staff and Parties Response Testimony	January 16, 2013
7 Hearing Start Week	February 4, 2013
8 Opening Brief	TBD
9 Closing Brief	TBD

10 In addition, the Moving Parties request that a standard protective order be issued in this matter to
11 facilitate discovery.

12 Finally, because the parties have been able to arrive at a consensus schedule and agree to request
13 the issuance of a protective order, the Moving Parties respectfully request that the prehearing conference
14 scheduled for September 24, 2012 in this matter be cancelled.

15 Respectfully submitted this 21st day of September, 2012.

16
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19 By: 

20 RICHARD A. FINNIGAN, OSB No. 965357
21 Attorney for the Oregon Telecommunications
22 Association and through electronic authorization
23 on behalf of Mark P. Trinchero as attorney for tw
24 telecom of oregon llc and Comcast Phone of
25 Oregon LLC and through electronic authorization
26 on behalf of Jason W. Jones as Counsel for
Commission Staff

MOTION FOR ADOPT PROCEDURAL
SCHEDULE, ISSUE STANDARD
PROTECTIVE ORDER AND CANCEL
PREHEARING CONFERENCE - 2

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CERTIFICATE OF SERVICE
UM 1481

I certify that I sent the attached Motion to Adopt Procedural Schedule, Issue Standard Protective Order and Cancel Prehearing Conference by email and U.S. mail to the following:

FILING CENTER
PUBLIC UTILITY COMMISSION OF OREGON
PO BOX 2148
SALEM, OR 97308-2148
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I hereby certify that I served the attached Motion to Adopt Procedural Schedule, Issue Standard Protective Order and Cancel Prehearing Conference 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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18 Dated at Olympia, WA this 21 day of September, 2012.

19
20 By: 

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