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June 16, 2011

Carol Hulse
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: UM 1017

Dear Ms. Hulse:

Enclosed for filing in the above entitled matter, please find an original and five (5) copies of the Petition to Intervene, including Certificate of Service, of AT&T Communications of the Pacific Northwest, Inc., TCG Joint Venture holdings, Inc d/b/a TCG Oregon and AT&T Mobility LLC and its subsidiaries operating in Oregon.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Cynthia Manheim
General Attorney

attachment

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF OREGON**

UM 1017

In the Matter of)	
)	PETITION TO INTERVENE BY
PUBLIC UTILITY COMMISSION OF)	AT&T
OREGON)	
)	
Staff Investigation of the Expansion of the)	
Oregon Universal Service Fund to include)	
the Service Areas of Rural)	
Telecommunications Carriers)	

AT&T Communications of the Pacific Northwest, Inc., TCG Joint Venture Holdings, Inc d/b/a TCG Oregon and AT&T Mobility LLC and its subsidiaries operating in Oregon (collectively “AT&T”) hereby submit this Petition to Intervene pursuant to OAR 860-012-0001 in the above-referenced docket.

I. Name and Address of Petitioners

AT&T Communications of the Pacific Northwest, Inc.
One AT&T Way, Room 2B115E, Bedminster, NJ 07921

TCG joint Venture Holdings, Inc. d/b/a TCG Oregon
One AT&T Way, Room 2B115E, Bedminster, NJ 07921

AT&T Mobility LLC
1025 Lenox Park Blvd. NE, Atlanta, GA 30319

II. Name and Address of Petition’s Attorney and Representative

Petitioners will be represented in this proceeding by the following attorney, and a motion for pro hac vice will be filed in this docket separate of this filing:

Cindy J. Manheim
General Attorney
AT&T
PO Box 97061
Redmond, WA 98073
(425) 580-8112 (telephone)
(425) 580-8333 (facsimile)
cindy.manheim@att.com

In addition, AT&T requests that the following representatives be on the service list, and paper service for AT&T is waived:

Sharon L. Mullin
Director – External Affairs
AT&T Services, Inc.
400 W. 15th St., Ste. 930
Austin, TX 78701
(512) 879-2280 (telephone)
(832) 213-0203 (facsimile)
slmullin@att.com

David Collier
Area Manager – Regulatory Affairs
AT&T Services, Inc.
645 E. Plumb Lane, Rm. C-142
P.O. Box 11010
Reno, NV 89520
(775) 333-3986 (telephone)
(775) 333-2364 (facsimile)
david.collier@att.com

III. Nature and Extent of Petitioner’s Interest in This Proceeding

This docket is a request for investigation into the issue of expanding the Oregon Universal Service Fund (“OUSF”) to include the service areas of rural telecommunications carriers

AT&T has a direct and substantial interest in the outcome of this issue and has been actively involved in this issue before the Federal Communications Commission. As such, AT&T has an interest to make sure that this proceeding is resolved in a reasonable, competitively neutral and nondiscriminatory manner.

IV. The Issues the Petitioner Intends to Raise in the Proceedings

AT&T generally intends to address or comment on various issues raised in this docket. AT&T's appearance will not unreasonably broaden the issues, burden the record, or delay this proceeding.

V. Petitioner's Special Knowledge or Expertise, if any, that would assist the Commission in Resolving the Issues in the Proceedings

AT&T has participated in other state and FCC proceedings on a number of USF issues and has extensive expertise that can assist the Commission in resolving the issues in this Proceeding.

VI. Conclusion

AT&T respectfully requests that the Commission grant its Petition to Intervene in this docket with all of the rights afforded a full party under Oregon law and the Commission's rules.

Dated this 16th day of June, 2011

AT&T COMMUNICATIONS OF THE PACIFIC
NORTHWEST, INC. TCG Joint Venture
Holdings, Inc d/b/a TCG Oregon, AT&T
Mobility LLC

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CERTIFICATE OF SERVICE
UM 1017

I hereby certify that on the 16th day of June, 2011, I served the foregoing Petition to Intervene by AT&T in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at the address shown below, or via email only if the service list indicates such persons waive paper service.

<p>Calvin K. Simshaw (W) Associate Gen Counsel CenturyTel of Oregon Inc PO Box 9901 Vancouver, WA 98668-8701 calvin.simshaw@centurytel.com</p>	<p>Robert Jenks (W) Executive Director Citizens' Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 bob@oregoncub.org</p>	<p>G. Catriona McCracken (W) Legal Counsel/Staff Atty Citizens' Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 catriona@oregoncub.org</p>
<p>Raymond Myers (W) Attorney Citizens' Utility Board of OR 610 SW Broadway, Ste 400 Portland, OR 97205 ray@oregoncub.org</p>	<p>Mark P. Trincherro (W) Davis Wright Tremaine LLP 1300 SW Fifth Ave Ste 2300 Portland, OR 97201-5682 marktrincherro@dwt.com</p>	<p>Nancy Judy (W) State Exec Embarq Communications Inc 902 Wasco St A0412 Hood River, OR 97031 barbara.c.young@centurylink.com</p>
<p>Renee Willer (W) External Affairs Manager Frontier Communications 20575 NW Von Neumann Dr. Beaverton, OR 97006-6982 renee.willer@fr.com</p>	<p>Joseph Chicoine (W) Manager – State Gov Affairs Frontier Communications PO Box 340 Elk Grove, CA 95759 jchicoin@czn.com</p>	<p>Carsten Koldsbaek (W) Consulting Manager GVNW Consulting Inc PO Box 2330 Tualatin, OR 97062 ckoldsbaek@gvnw.com</p>
<p>Jim Rennard (W) Consulting Manager GVNW Consulting Inc PO Box 2330 Tualatin, OR 97062 jrennard@gvnw.com</p>	<p>Jeffrey H Smith (W) Vice President & Regional Mgr GVNW Consulting Inc PO Box 2330 Tualatin, OR 97062 jsmith@gvnw.com</p>	<p>Richard A. Finnigan (W) Attorney at Law Law Office of Richard A. Finnigan 2112 Black Lake Blvd SW Olympia, WA 98512 rickfinn@localaccess.com</p>
<p>Lisa F. Rackner (W) Attorney McDowell Rackner & Gibson PC 419 SW 11th Ave., Suite 400 Portland, OR 97205 lisa@mcd-law.com</p>	<p>Craig Phillips (W) Oregon Exchange Carrier Assn 800 C. St. Vancouver, WA 98660 cphillips@oeca.com</p>	<p>Brant Wolf (W) Executive Vice President Oregon Telecommunications Assn 777 13th St SE – STE 120 Salem, OR 97301-4038 bwolf@ota-telecom.org</p>

Lawrence Reichman (W) Perkins Coie LLP 1120 NW Couch St – 10 FL Portland, OR 97209-4128 reichman@perkinscoie.com	Roger White (W) Program Manager Public Utility Commission of OR PO Box 2148 Salem, OR 97308 roger.white@state.or.us	Michael T. Weirich (W) Assistant Attorney General Department of Justice 1162 Court St. NE Salem, OR 97301-4096 michael.weirich@doj.state.or.us
Lyndall Nipps (W) Vice President, Regulatory TW Telecom of Oregon LLC 9665 Granite Ridge Dr – Ste 500 San Diego, CA 92123 lyndall.nipps@twtelecom.com	Adam Lowney (W) McDowell Rackner & Gibson PC 419 SW 11 th Ave., Suite 400 Portland, OR 97205 adam@mcd-law.com	Tim Spannring (W) Operations Manager Comspan Communications, Inc. 278 NW Garden Valley Blvd. Roseburg, OR 97470 tims@comspancomm.com

(W) = Waive Paper Service

DATED this 16th day of June, 2011

AT&T

By: _____
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