

June 22, 2011

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

Re: UM-1017(3) – TRACER’s Petition to Intervene

To the Commission:

Enclosed for filing please find an original and two copies of TRACER’s Petition to Intervene and Waiver of Paper Service.

Very truly yours,  
ATER WYNNE LLP



Susan Carpenter  
Assistant to Arthur A. Butler

Enclosures  
cc: Parties of Record

1236454/1/SMA/000800-0007

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2  
3 **BEFORE THE PUBLIC UTILITY COMMISSION**  
4 **OF OREGON**  
5 **UM 1017(3)**

6 In the Matter of  
7 PUBLIC UTILITY COMMISSION OF  
8 OREGON  
9 Investigation into Expansion of the Oregon  
10 Universal Service Fund to Include the Service  
Areas of Rural Telecommunications Carriers

PETITION TO INTERVENE  
& WAIVER OF PAPER SERVICE OF  
TELECOMMUNICATIONS RATEPAYERS  
ASSOCIATION FOR COST-BASED AND  
EQUITABLE RATES

11 The Telecommunications Ratepayers Association for Cost-based and Equitable Rates  
12 (“TRACER”) respectfully petitions to intervene in this proceeding and gives notice of its intent  
13 to participate as a full party.

14 In support of this petition, TRACER states as follows:

- 15 1. The name and address of the petitioner is:

16 TRACER Oregon  
17 1331 NW Lovejoy Street, Suite 900  
18 Portland, OR 97209-3280

- 19 2. The name and addresses of the attorneys representing the petitioner are:

20 Arthur A. Butler (*pro hac vice*)  
21 Ater Wynne LLP  
22 601 Union Street, Suite 1501  
23 Seattle, WA 98101-3981  
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8 3. TRACER is a coalition representing entities that are large users of  
9 telecommunications services in the State of Oregon.

10 4. TRACER members are large end-user customers of telecommunications  
11 companies in Oregon. Contributions to the Oregon USF are passed on to and paid by end-users  
12 such as TRACER members. This proceeding could directly affect the amount that TRACER  
13 members are required to pay in the form of OUSF contributions. Accordingly, TRACER has a  
14 direct interest in this proceeding. As the representative of its members, TRACER has  
15 knowledge and expertise that will assist the Commission and the parties in resolving the issues  
16 presented in this proceeding.

17 5. TRACER was not on the service list for this proceeding and did not get notice of  
18 the prehearing conference or the order setting the date for filing petitions to intervene.  
19 Moreover, TRACER did not become aware of the schedule in the case and the date for filing  
20 petitions to intervene until after that day had passed. Upon learning of the schedule in the case  
21 TRACER has moved promptly to file this petition.

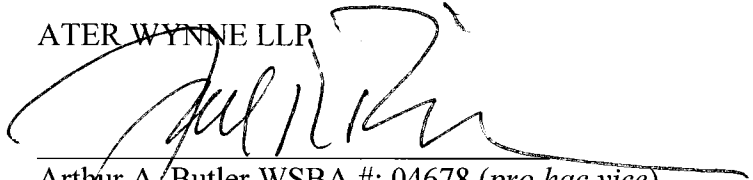
22 5. The participation of TRACER in this proceeding will not unduly broaden the  
23 issues or burden the record. And, no party will be prejudiced by granting TRACER's petition  
24 to intervene at this time.

25 Based on the information provided above in accordance with the Commission's rules of  
procedure, we request to participate in this proceeding as an intervenor. I or the organization  
that I represent will not unreasonably broaden the issues, burden the record, or unreasonably  
delay the proceeding. OAR 860-012-0001.

1 RESPECTFULLY SUBMITTED this 22nd day of June, 2011.

2 ATER WYNNE LLP

3  
4 By:



5 Arthur A. Butler WSBA #: 04678 (*pro hac vice*)

6 Joel R. Paisner OSB # 100580

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12 Attorneys for TRACER

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 22nd day of June, 2011, served the foregoing along with the correct number of copies, of the foregoing PETITION TO INTERVENE & WAIVER OF PAPER SERVICE OF TELECOMMUNICATIONS RATEPAYERS ASSOCIATION FOR COST-BASED AND EQUITABLE RATES in docket UM 1017(3) upon each party listed in the UM 1017(3) PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending 2 copies by U.S. mail, postage prepaid to the Commission's Salem offices at:

Filing Center  
Public Utility Commission of Oregon  
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17  
18  
19 I declare under penalty of perjury under the laws of the State of Washington that the  
20 foregoing is true and correct.

21 DATED this 22nd day of June, 2011, at Seattle, Washington

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