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May 31, 2011

**VIA E-MAIL AND U.S. MAIL**

Filing Center  
Oregon Public Utility Commission  
550 Capitol Street NE Ste 215  
Salem, OR 97301-2551

Re: UM 1017(3) – Petition to Intervene

Dear Sir/Madam:

Enclosed are the original and one copy of a Petition to Intervene for the Oregon Telecommunications Association and Certificate of Service.

Sincerely,



RICHARD A. FINNIGAN

RAF/km  
Enclosures

cc: Service List (via e-mail and U.S. mail)  
Brant Wolf (via e-mail)  
Craig Phillips (via e-mail)  
Member Companies (via e-mail)

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

DOCKET NO. UM 1017(3)

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

PETITION TO INTERVENE

Investigation into Expansion of the Oregon  
Universal Service Fund to Include the  
Service Areas of Rural  
Telecommunications Carriers

NAME OF PETITIONER: Oregon Telecommunications Association

ADDRESS: 777 13th Street SE, Suite 120, Salem, OR 97301-4038

PHONE NUMBER: (503) 581-7430

E-MAIL ADDRESS: bwolf@ota-telecom.org

NAME OF COUNSEL FOR PETITIONER: Richard A. Finnigan

COUNSEL'S ADDRESS: 2112 Black Lake Blvd SW, Olympia, WA 98512

COUNSEL'S PHONE NUMBER: (360) 956-7001

COUNSEL'S E-MAIL ADDRESS: rickfinn@localaccess.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN  
AND THE PURPOSES OF THE ORGANIZATION:

Thirty. OTA is a trade association representing the telecommunications industry in Oregon.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE  
PROCEEDINGS:

Petitioner is appearing on behalf of its members, which primarily are made up of the incumbent local exchange companies serving in the state of Oregon.

**THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDINGS:**

Petitioner will raise only those issues that are directly related to the issues raised in this matter.

**PETITIONER'S SPECIAL KNOWLEDGE OR EXPERTISE, IF ANY, THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDINGS:**

Petitioner's member companies are very familiar with issues related to universal service. Petitioner's member companies will be directly affected by this docket.

**NAMES, ELECTRONIC ADDRESSES, TELEPHONE NUMBERS, AND PHYSICAL ADDRESSES OF THE REPRESENTATIVES THAT PETITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET:**

Brant Wolf, Oregon Telecommunications Association

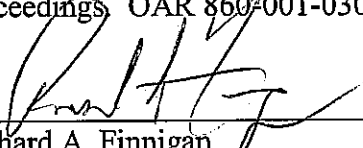
777 13th Street SE, Suite 120

Salem, OR 97301-4038

(503) 581-7430

[bwolf@ota-telecom.org](mailto:bwolf@ota-telecom.org)

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in these proceedings as a party. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or delay the proceedings. OAR 860-001-0300.

  
Richard A. Finnigan  
Petitioner's Representative

May 31, 2011

Date

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**CERTIFICATE OF SERVICE**  
**UM 1017(3)**

I certify that I have this day sent the attached Petition to Intervene for the Oregon Telecommunications Association by electronic mail and U.S. mail to the following:

FILING CENTER  
PUBLIC UTILITY COMMISSION OF OREGON  
550 CAPITOL STREET NE STE 215  
SALEM, OR 97301-2551  
puc.filingcenter@state.or.us

I further certify that I have this day sent the attached Petition to Intervene for the Oregon Telecommunications Association by electronic mail pursuant to OAR 860-013-0070, unless otherwise noted, to the following parties or attorneys of parties:

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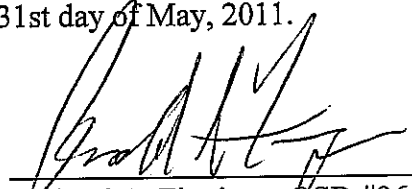
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Dated at Olympia, Washington, this 31st day of May, 2011.



Richard A. Finnigan, OSB #965357  
Attorney for the Oregon Telecommunications Association