

May 12, 2010

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

Re: UM 1481 – Petition to Intervene – TRACER

Enclosed are the original and 2 copies of TRACER's Petition to Intervene and Waiver of Paper Service. This document was e-filed today with the Commission. Please let me know if you have any questions.

Sincerely,

ATER WYNNE LLP



Susan Carpenter
Assistant to Arthur A. Butler

Enclosures

cc: Service List (via method(s) on Certificate of Service

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2
3 **BEFORE THE PUBLIC UTILITY COMMISSION**
4 **OF OREGON**
5 **UM 1481**

6 In the Matter of
7 PUBLIC UTILITY COMMISSION OF
8 OREGON
9 Staff Investigation of the Oregon Universal
10 Service Fund

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
24 aab@aterwynne.com
25 Phone: 206.623.4711
Fax: 206.467.8406

1 Roger T. Dunaway
2 Ater Wynne LLP
3 601 Union Street, Suite 1501
4 Seattle, WA 98101-3981
5 rtd@aterwynne.com
6 Phone: 206.623.4711
7 Fax: 206.467.8406

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 customers of telecommunications companies in
11 Oregon. As their representative, TRACER has knowledge and expertise that will assist the
12 Commission and the parties in resolving the issues presented in this proceeding.

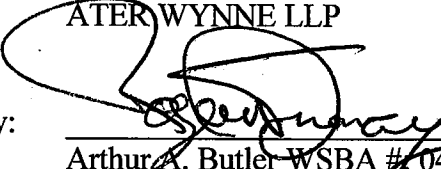
13 5. The participation of TRACER in this proceeding will not unduly broaden the
14 issues or burden the record.

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

19 RESPECTFULLY SUBMITTED this 12th day of May, 2010.

20 ATER WYNNE LLP

21 By:

22 
23 Arthur A. Butler WSBA # 04678 (*pro hac vice*)
24 Roger T. Dunaway OSB # 030294
25 601 Union Street, Suite 1501
Seattle, WA 98101-3981
Telephone: (206) 623-4711
Facsimile: (206) 467-8406
E-mail: aab@aterwynne.com
Attorneys for TRACER

CERTIFICATE OF SERVICE

I hereby certify that I have this 12th day of May, 2010, 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 1481 upon each party listed in the UM 1481 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.

(W denotes waiver of paper service; C denotes service of Confidential material authorized)

On Behalf Of Oregon Department of Justice:

Michael T. Weirich
Oregon Department of Justice
100 Justice Building
1162 Court Street NE
Salem OR 97301-4096

- Hand Delivered
- U.S. Mail (first-class, postage prepaid)
- Overnight Mail (UPS)
- Facsimile (503) 378-5300
- Email (Michael.Weirich@state.or.us)

Confidentiality Status:

On Behalf Of Citizens' Utility Board of Oregon:

W

Robert Jenks
Citizens' Utility Board of Oregon
Suite 308
610 SW Broadway
Portland OR 97205

- Hand Delivered
- U.S. Mail (first-class, postage prepaid)
- Overnight Mail (UPS)
- Facsimile (503) 274-2956
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Confidentiality Status:

On Behalf Of Citizens' Utility Board of Oregon:

W

Gordon Feighner
Citizens' Utility Board of Oregon
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Portland OR 97205

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On Behalf Of Citizens' Utility Board of Oregon: W

G. Catriona McCracken
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Confidentiality Status:

1 **On Behalf Of Citizens' Utility Board of Oregon:**
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2 Raymond Myers
3 Citizens' Utility Board of Oregon
4 Suite 308
610 SW Broadway
Portland OR 97205

5 *Confidentiality Status:*

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6 **On Behalf Of Public Utility Commission of Oregon:**

7 Roger White
8 Public Utility Commission of Oregon
9 PO Box 2148
Salem OR 97308

10 *Confidentiality Status:*

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 Facsimile
 Email (roger.white@state.or.us)

11 **On Behalf Of Oregon Exchange Carrier Association :**

12 Richard A. Finnigan
13 Law Office of Richard A. Finnigan
2112 Black Lake Boulevard SW
Olympia WA 98512

14 *Confidentiality Status:*

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 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 753-6862
 Email (rickfinn@localaccess.com)

15 **On Behalf Of Oregon Exchange Carrier Association:**

16 Craig Phillips
17 Oregon Exchange Carrier Association
800 C Street
Vancouver WA 98660

18 *Confidentiality Status:*

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile
 Email

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 12th day of May, 2010, at Seattle, Washington.

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