

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1481**

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF OREGON)	PETITION TO INTERVENE
)	
Staff investigation of the Oregon Universal Service Fund.)	

**PETITION TO INTERVENE OF
COMCAST PHONE OF OREGON, LLC**

Comcast Phone of Oregon, LLC¹ (“Comcast”) respectfully petitions the Commission for leave to intervene in the above-captioned proceeding.

In support of its petition, Comcast states as follows:

I.

Comcast’s name and address are:

Comcast Phone of Oregon, LLC
One Comcast Center
Philadelphia, PA 19103-2838

¹ Comcast Phone is a facilities-based competitive local exchange carrier and is authorized to provide local exchange, interexchange and operator services in Oregon pursuant to a certificate of authority granted by this Commission in Order No. 07-481, issued in Docket No. CP 1070 on October 30, 2007.

II.

All correspondence in this matter should be directed to:

Doug Cooley
Manager, Government Affairs
Comcast
9605 SW Nimbus Ave.
Beaverton, Oregon 97008
Telephone: (503) 584-5795
Doug_Cooley@cable.comcast.com

Mark P. Trincherro
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2300
Portland, Oregon 97201
Telephone: (503) 778-5318
Facsimile: (503) 778-5299
marktrincherro@dwt.com

III.

The Commission has opened this docket to conduct a comprehensive investigation of the Oregon Universal Service Fund (“OUSF”), including examination of issues such as whether there should continue to be an OUSF, what services should be supported (including broadband services), design of both the contribution and distribution mechanisms, rate rebalancing and possible changes to intercarrier compensation. Comcast is a competitive provider of telecommunications services in Oregon. As such, it is a contributor to the OUSF. It also pays and receives intercarrier compensation, and competes with incumbent carriers whose rates may be subject to rebalancing. Comcast therefore submits this Petition to Intervene because it is materially interested in, and will likely be substantially affected by, the Commission’s resolution of the issues presented in this proceeding.

IV.

Comcast expects to participate in the docket and will contribute to the Commission’s examination of the issues its perspective as a competing provider of telecommunications services and broadband services. Comcast will address such issues as it deems relevant in this proceeding.

IV.

Comcast has knowledge and expertise that will assist the Commission and the parties in addressing the issues presented in this proceeding.

V.

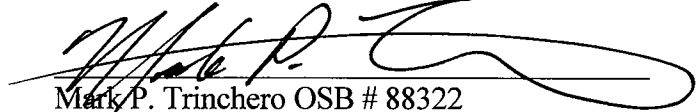
Comcast's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

CONCLUSION

Comcast's Petition to Intervene should be granted.

DATED this 26th day of May 2010.

DAVIS WRIGHT TREMAINE LLP



Mark P. Trinchero OSB # 88322
1300 SW Fifth Avenue, Suite 2300
Portland, OR 97201
Tel: (503) 241-2300
Fax: (503) 778-5299
Attorneys for Comcast

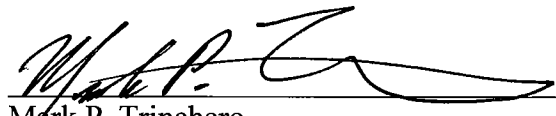
**CERTIFICATE OF SERVICE
UM 1481**

I hereby certify that the foregoing Petition to Intervene was served on the following persons on May 26, 2010, by email to all parties and by U.S. Mail to parties who have not waived paper service:

Arthur A. Butler Ater Wynne LLP 601 Union Street, Suite 1501 Seattle, WA 98101-3981 aab@aterwynne.com	Roger T. Dunaway Ater Wynne LLP 601 Union St., Suite 1501 Seattle, WA 98101-3981 rtd@aterwynne.com
Gordon Feighner Energy Analyst Citizens' Utility board of Oregon 610 SW Broadway, Suite 308 Portland, OR 97205 gordon@oregoncub.org	Robert Jenks Executive Director Citizens' Utility board of Oregon 610 SW Broadway, Suite 308 Portland, OR 97205 bob@oregoncub.org
G. Catriona McCracken Legal Counsel/Staff Attorney Citizens' Utility board of Oregon 610 SW Broadway, Suite 308 Portland, OR 97205 catriona@oregoncub.org	Raymond Myers Attorney Citizens' Utility board of Oregon 610 SW Broadway, Suite 308 Portland, OR 97205 ray@oregoncub.org
Kevin Elliott Parks Staff Attorney Citizens' Utility board of Oregon 610 SW Broadway, Suite 308 Portland, OR 97205 kevin@oregoncub.org	Michael T. Weirich Assistant Attorney General Department of Justice Regulated Utility & Business Section 1162 Court St. N.E. Salem, OR 97301-4096 michael.weirich@doj.state.or.us
Jack Phillips Frontier Communications of America 14450 Burnhaven Dr. Burnsville, MN 55306 jack.phillips@frontiercorp.com	Ingo Henningsen Manager, Government & External Affairs Frontier Communications of America, Inc. 4064 Lisa Dr. Salt Lake City, UT 84124-2118 ingo.henningsen@frontiercorp.com

<p>Douglas K. Denney Integra Telecom of Oregon Inc. 6160 Golden Hills Dr. Golden Valley, MN 55416-1020 dkdenney@integratelecom.com</p>	<p>Theodore N. Gilliam Senior Corporate Counsel Integra Telecom, Inc. 1201 N.E. Lloyd Blvd., Suite 500 Portland, OR 97232 tgilliam@integratelecom.com</p>
<p>Richard A. Finnigan Attorney at Law 2112 Black Lake Blvd. S.W. Olympia, WA 98512 rickfinn@localaccess.com</p>	<p>Craig Phillips Oregon Exchange Carrier Assn. 800 C. St. Vancouver, WA 98660 cphillips@oeca.com</p>
<p>Brant Wolf Executive Vice President Oregon Telecommunications Assn. 777 13th St. S.E., Suite 120 Salem, OR 97301-4038 bwolf@ota-telecom.org</p>	<p>Roger White Program Manager Public Utility Commission of Oregon P.O. Box 2148 Salem, OR 97308 roger.white@state.or.us</p>
<p>Alex M. Duarte Corporate Counsel Qwest Corporation 421 S.W. Oak St., Suite 810 Portland, OR 97204 alex.duarte@qwest.com</p>	<p>Mark Reynolds Qwest Corporation 1600 7th Ave., Room 3206 Seattle, WA 98191 mark.reynolds@qwest.com</p>

Dated this 26 day of May, 2010



 Mark P. Trincherro
 Davis Wright Tremaine, LLP
 1300 SW 5th Avenue, Suite 2300
 Portland, OR 97201