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May 19, 2011

VIA E-MAIL AND U.S. MAIL

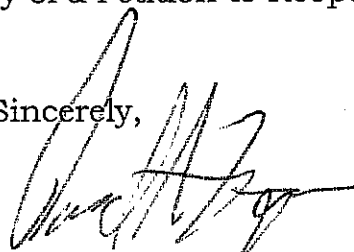
Filing Center
Oregon Public Utility Commission
550 Capitol Street NE Ste 215
Salem, OR 97301-2551

Re: UM 1017 – Petition to Reopen Docket

Dear Sir/Madam:

Enclosed are the original and one copy of a Petition to Reopen Docket 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)

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1017

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

PETITION TO REOPEN DOCKET

Pursuant to authority granted to it by the Oregon Public Utility Commission (Commission) in OAR 860-032-0100, the Oregon Exchange Carrier Association, Inc. (OECA) hereby files this Petition to Reopen UM 1017. The purpose in reopening UM 1017 would be to investigate the feasibility of achieving intrastate access reform by moving intrastate access rates downward to the interstate access rate levels with support coming from the Oregon universal service fund (OUSF).

BACKGROUND

This Petition is a result of docket action taken in OECA Docket 11-03. The issue of universal service reform and intercarrier compensation reform has been a matter of much discussion on both the intrastate and interstate levels over the past year. For example, the Commission conducted several workshops and there were extensive filings made concerning intrastate universal service issues in Docket UM 1481. Further, there has been a great deal of discussion at the federal

PETITION TO REOPEN DOCKET - 1

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1 level as a result of the National Broadband Plan. In particular, extensive comments have been
2 recently filed in response to the FCC's Notice of Proposed Rulemaking (NPRM).¹

3 As a result of this ongoing discussion, Monroe Telephone Company filed to open OECA
4 Docket 11-03. Pursuant to the rules of procedure adopted by OECA pursuant to the authority in
5 OAR 860-032-0100(7), docket sessions were held. The docket recommendation was to file this
6 Petition. That recommendation was approved by the OECA Board and has been transmitted to the
7 Commission this same day.

8 In Docket UM 1017, the Commission adopted procedures and policies for rural incumbent
9 local exchange carrier participation in the OUSF. See, Order No. 03-082 entered February 3, 2003.
10 Under the policies that were adopted, OUF support for rural incumbent local exchange carriers was
11 determined and used to reduce carrier common line access charges. Order No. 03-082 also
12 established the process for triennial reviews.

13 During the first triennial review in 2006, because of concerns about increasing the size of
14 the OUSF, it was agreed that per line support for OECA members would remain the same. The
15 same result occurred in the second triennial review in 2009. See, Order No. 09-246 entered June
16 23, 2009. That extension will expire this calendar year.

17 While considerations related to the size of the OUSF continue to be an important
18 consideration, so is the need to review whether OUF support can be used to reduce existing
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23 ¹ *Connect America Fund*, WC Docket No. 10-90, *A National Broadband Plan for Our Future*, GN Docket No. 09-51,
24 *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *High-Cost Universal*
25 *Service Support*, WC Docket No. 05-337, *Developing an Unified Intercarrier Compensation Regime*, CC Docket No.
26 01-92, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Lifeline and Link-Up*, WC Docket No.
03-109, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, FCC 11-13 (rel. Feb. 9, 2011).

1 intrastate access rates for OECA members. The question is whether it is feasible to reduce intrastate
2 access rates to interstate access rate levels² using support from the OUSF.

3 RELIEF REQUESTED

4 The OECA respectfully requests that the Commission reopen UM 1017 to consider the
5 feasibility of reducing intrastate access rate levels to the interstate access rate level with support
6 from the OUSF.

7 Respectfully submitted this 19th day of May, 2011.

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11 RICHARD A. FINNIGAN, OSB No. 965357
12 Attorney for the Oregon Exchange Carrier Association

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24 ² Because there are different rate structures for intrastate and interstate access, the goal would be to look at composite
25 rate levels.

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**CERTIFICATE OF SERVICE
UM 1017**

I certify that I have this day sent the attached Petition to Reopen Docket 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
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I further certify that I have this day sent the attached Petition to Reopen Docket by electronic mail pursuant to OAR 860-013-0070, and by U.S. mail, unless otherwise noted, to the following parties or attorneys of parties:

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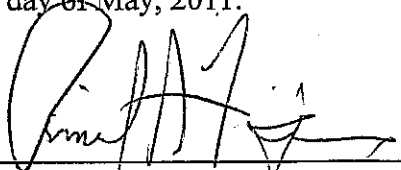
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JEFFRY H. SMITH
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Dated at Olympia, Washington, this 19th day of May, 2011.



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