

HOLBROOK & SEIFERT LLC
Attorneys at Law

P.O. Box 2087 Newport OR 97365

Phone (541) 265-2080 Fax (541) 265-2131

Douglas R. Holbrook

Ronald H. Seifert

January 25, 2011

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

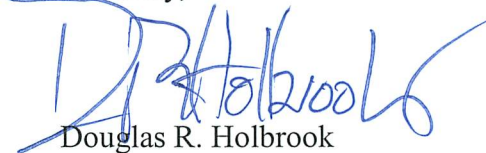
RE: UM 1484 CenturyLink/Qwest
Intervenors' City of Lincoln City, Lincoln County, Tillamook County & Parker
Telecommunications ("Coastal Intervenors")

Dear Filing Center:

I enclose the original and five copies of the Coastal Intervenor's brief submitted post-hearing.

Thank you for your attention. If you have any questions or concerns, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. R. Holbrook", with a stylized flourish at the end.

Douglas R. Holbrook

cc: Service List

[100831 ltr to PUC.wpd]

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1484

In the Matter of)
CENTURYLINK, INC.) COASTAL INTERVENORS'
) CLOSING BRIEF
)
Application for merger between CenturyTel,)
Inc. and Qwest Communications International,)
Inc.)

INTRODUCTION

The Coastal Intervenors, consisting of Lincoln City, Parker Telecommunications, Lincoln County and Tillamook County jointly submit this closing argument memorandum and incorporate herein their Objection to Stipulation, filed December 14, 2010, and the condition language therein.

The PUC staff and applicant agreed to a condition to this merger which specifically directs management and assets toward the phone network allegedly to improve the reliability experienced by the Lincoln City area subscribers. The condition is/states:

26. CenturyLink will construct a physical communication link between the Cities of Lincoln City and Newport, Oregon within 24 months following the close of the transaction. CenturyLink will meet with Staff and other interested parties during the engineering phase to make certain that Staff is satisfied that the facility is sized adequately to hand the expected demand.

There is little testimony in the record purporting to support Condition 26 as it is currently written. There is no evidence submitted by the applicants or PUC Staff which establishes that the condition will address the actual network problem. The condition also ignores the wider area of north Lincoln County and Tillamook County. Therefore the

1 condition should be revised to adequately address the need for a diverse fiber route to
2 establish network voice/data reliability in these Intervenor's' geographic regions.

3 4 **ARGUMENT**

5 **A. Joint and Staff Testimony Does Not Support the Condition as Written.**

6 The joint testimony submitted in support of the settlement between staff and the
7 applicants (Testimony In Support of Stipulation, Pages 12-13) contained only general
8 statements about Condition 26, as follows:

9 **Q. WHAT SAFETY-RELATED CONDITIONS DID CENTURYLINK AGREE TO?**

10 **A.** . . . Finally, CenturyLink has agreed to construct a physical
11 communication link between the Cities of Lincoln City and
12 Newport, Oregon within 24 months following the close of the
13 Transaction. CenturyLink will meet with Staff and other
14 interested parties during the engineering phase to make certain
15 that Staff is satisfied that the facility is sized adequately to
16 handle the expected demand. This commitment will address
17 911 network concerns raised by Staff, CUB and other
18 Intervenor's.

19 This testimony fails to explain any factual basis linking the condition to the actual
20 network problems detailed in Parker 100-400.

21 The original PUC testimony in support of the condition, Staff 100, stated at
22 Dougherty/30-31:

23 Staff recommended ordering condition 28 requires CenturyLink to
24 construct a physical communication link between the cities of Lincoln
25 City and Newport, Oregon, which would allow network redundancy.
26 Commission Safety Staff believes that this link is necessary as a result
of system outages, community isolation, and lack of network
redundancy. Additionally, Staff has received a letter in support of such
condition from the Oregon Military Department, Oregon Emergency
Management (OEM).³⁵ In UM 1484 CUB/100, Feighner/3, Mr.
Feighner also supports construction of a physical connection between
Lincoln City and Newport, Oregon, or some other form of network
redundancy.

27 Michael Dougherty was cross examined by Coastal Intervenor's on the first day of the
28 hearing. After establishing that Mr. Dougherty was not an expert witness in

telecommunication systems (and thus could not rely upon heresay), he was asked about his understanding of the network outages in Lincoln and Tillamook Counties. He admitted that he did not know the history nor the nature of the system outages on the coast, other than to say it had something to do with 9-1-1 service problems. (Transcript of Proceedings, Pages 223-227.) By admitting he knows nothing about the specifics of the network or the outages, Mr. Dougherty has admitted that he can not know if Condition 26 would fix the system outages in or around Lincoln City. Any other information in his testimony is heresay.

Neither staff nor applicants offered any other relevant testimony in support of Condition 26 as written, though they had the opportunity to do so. Therefore the only description of the basis for the condition and its modification is through Parker 100-400.

B. Joint Intervenors Testimony Establishes Basis to Modify Condition 26.

It should be obvious that making a connection from Lincoln City that stops in Newport does not create a redundant path to Sheridan. As explained in the testimony submitted by Parker Telecommunications,¹ there are numerous switches in the Lincoln City area alone, nearly all of which require communication with Sheridan's central office to function at all. Parker 100/8. Thus, when the connection to Sheridan fails, those remote switches just don't work and neither do citizens' phones nor 9-1-1. Parker 100/8. This is the case in all of Tillamook County as well. A condition making just a physical link to Newport does nothing to connect those critical remote switches to Sheridan for local, extended area calling nor for data service. Parker 100/8-10. Therefore the condition is inadequate as written.

The network problem is described in David Hawker's unrebutted testimony at Parker 300. It is also described by Lt. Jerry Palmer's unrebutted testimony at Parker 200. The description is clear from this testimony: when the single strand of fiber is severed between

¹ Adopted by the Coastal Intervenors.

1 Lincoln City and the central switch in Sheridan, the phone network in north Lincoln County
2 barely functions if at all, and 9-1-1 service is therefore barely functional, if at all, during the
3 outage. In Tillamook County all of the phone network fails as well. See unrebutted
4 testimony of Deputy Gordon McGraw, Parker 400. This is an issue of safety and economic
5 viability for the region.

6 The solution to the network reliability is set forth in Dr. Parker's unrebutted expert
7 testimony at Parker 100: a diverse fiber pathway to Sheridan forming a self-healing fiber ring.
8 This is the solution for all of the Intervenor's geographic regions.

9 The PUC Staff may have intended for network redundancy, but the condition fails to
10 require it because it requires no redundant connection to Sheridan.² The applicants have
11 already agreed to spend money on the phone network in Condition 26, and the stipulation
12 allows them to count those expenditures against \$45 million in broadband improvement costs
13 (see Condition 13). The diverse, redundant fiber will greatly enhance applicant's broadband
14 capability and service. Applicants will control all the necessary fiber pathways to meet a
15 revised condition. Parker 100/5.

16 In sum, there is no testimony supporting Condition 26 as a solution to the problem at
17 hand. The Coastal Intervenor's testimony establishes the condition requires modification
18 because as written it has nothing to do with making the fiber connection diverse, hardened or
19 redundant between the north Lincoln and Tillamook Counties remote switches and
20 Sheridan's central office.

21 **C. The Commission Should Include Parker Telecommunications Condition**
22 **Regarding Intrastate Internet Traffic.**

23 The conditions in the stipulation failed to address Parker Telecommunications second
24 suggested merger condition, requiring applicants to, whenever possible, enter into agreements

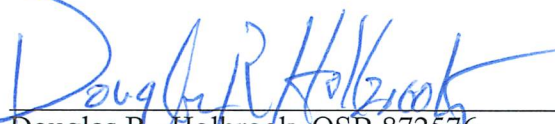
25
26 ² The condition does not require a new central-switch be installed in Newport, to
back-up the one in Sheridan, or that the fiber continue to Sheridan.

1 to route intrastate Internet traffic only in Oregon, increasing the reliability and speed of that
2 traffic. See Parker 100/5-6, and Exhibits 101-104. This would greatly enhance applicant's
3 broadband service quality and competitiveness, and should be part of the Stipulated
4 Condition 13.

CONCLUSION

5
6 There is no credible testimony supporting the current version of Condition 26, and it
7 should be revised to adequately address the network reliability problems in the Coastal
8 Intervenor's geographic areas. Parker Telecommunications second merger condition should
9 be adopted as part of Condition 13.

10 Dated this 25th day of January, 2011.

11
12 

13 Douglas R. Holbrook, OSB 872576
14 Holbrook & Seifert LLC
15 Special Counsel to Petitioner Lincoln City
16 Attorney for Parker Telecommunications
17 PO Box 2087, Newport OR 97365
18 (541) 265-2080 Fax (541) 265-2131
19 doug@lawbyhs.com

20 

21 Wayne Belmont, OSB No. 841662
22 Lincoln County Counsel
23 225 W Olive Street, #101 Newport OR 97365
24 (541) 265-4108 Fax (541) 265-4176
25 wbelmont@co.lincoln.or.us

26
William Sargent, OSB 891678
Tillamook County Counsel
1134 Main Avenue, Tillamook OR 97141
(503) 842-4921 Fax (503) 842-8862
wsargent@oregoncoast.com

CERTIFICATE OF SERVICE

UM 1484

I certify that on this day I served the foregoing **Coastal Intervenors' Closing Brief** in docket UM 1484 on each party listed in the UM 1484 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid.

Michel Singer Nelson
360Networks(USA) Inc
370 Interlocken Blvd Ste 600
Broomfield CO 80021-8015

John Felz
Century Farm Court
5454 W 110th St KSOPKJ0502
Overland Park KS 66211
john.felz@centurylink.com

Penny Stanley
360Networks(USA) Inc
370 Interlocken Blvd Ste 600
Broomfield CO 80021-8015
penny.stanley@360.net

Rhonda Kent
Centurylink
805 Broadway 8th Floor
Vancouver WA 98660
ronda.kent@centurylink.com

Arthur A Butler
Atter Wynne LLP
601 Union Street, Ste 1501
Seattle WA 98101-3981
aab@aterwynne.com

William E Hendricks
Centurylink, Inc.
805 Broadway St
Vancouver WA 98660-3277
tre.hendricks@centurylink.com

Joel Paisner
Atter Wynne LLP
601 Union Street, Ste 1501
Seattle WA 98101-2327
jrp@aterwynne.com

Michael R Moore
Charter Fiberlink OR - CCVII LLC
12405 Powercourt Dr
St Louis MO 63131
michael.moore@chartercom.com

Charles L Best
Attorney at Law
1631 NE Broadway #538
Portland OR 97232-1425
chuck@charleslbest.com

Gordon Feighner
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 308
Portland OR 97208
gordon@oregoncub.org

Richard Stevens
Central Telephone Inc
PO Box 25
Goldendale WA 98620
rstevens@gorge.net

Robert Jenks
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 308
Portland OR 97208
bob@oregoncub.org

1 G. Catriona McCracken
2 Citizens' Utility Board of Oregon
3 610 SW Broadway, Suite 308
4 Portland OR 97208
catriona@oregoncub.org

5 Raymond Myers
6 Citizens' Utility Board of Oregon
7 610 SW Broadway, Suite 308
8 Portland OR 97208
ray@oregoncub.org

9 Kevin Elliott Parks
10 Citizens' Utility Board of Oregon
11 610 SW Broadway, Suite 308
12 Portland OR 97208
kevin@oregoncub.org

13 Charles Jones
14 Communication Connection
15 14250 SW Science Park Dr Ste B
16 Portland OR 97229
charlesjones@cms-nw.com

17 Marsha Spellman
18 Converge Communications
19 10425 SW Hawthorne LN
20 Portland OR 97225
marsha@convergecomm.com

21 Frank G Patrick
22 Corporate Lawyers PC
23 PO Box 231119
24 Portland OR 97281
fgplawpc@hotmail.com

25 Katherine K. Mudge
26 Covad Communications Co
7000 N Mopac Expwy 2nd Fl
Austin TX 78731
kmudge@covad.com

K C Halm
Davis Wright Tremaine LLP
1919 Pennsylvania Ave NW 2nd Fl
Washington DC 20006-3458
kchalm@dwt.com

Brian A. Nixon
Davis Wright Tremaine LLP
1919 Pennsylvania Ave NW Ste 800
Washington DC 20006-3458

Mark P Trinchero
Davis Wright Tremaine LLP
1300 SW Fifth Ave Stee 2300
Portland OR 97201-5682
marktrinchero@dwt.com

Jason W Jones
Department of Justice
Regulated Utility & Business Section
1162 Court Street NE
Salem OR 97301-4096
jason.w.jones@state.or.us

Edwin B Parker
Economic Development Alliance
PO Box 402
Glenden Beach OR 9788
edparker@teleport.com

Judith Endejan
Graham & Dunn PC
2801 Alaskan Way, Suite 300
Seattle WA 98121
jendejan@grahamdunn.com

Gregory Merz
Gray Plant Mooty
500 IDS Center
80 S Eighth St
Minneapolis MN 55402
gregory.merz@gpmlaw.com

Karen L. Clauson
Integra Telcom Inc
6160 Golden Hills Dr
Golden Valley MN 55416-1020
klcauson@integratelecom.com

Greg L. Rogers
Level 3 Communications LLC
1025 Eldorado Blvd
Broomfield CO 80021
greg.rogers@level3.com

Adam Lowney
McDowell Rackner & Gibson PC
419 SW 11th Ave Ste 400
Portland OR 97205
adam@mcd-law.com

Wendy McIndoo
McDowell Rackner & Gibson PC
419 SW 11th Ave Ste 400
Portland OR 97205
wendy@mcd-law.com

Lisa F Rackner
McDowell Rackner & Gibson PC
419 SW 11th Ave Ste 400
Portland OR 97205
lisa@mcd-law.com

Greg Marshall
Northwest Public Communications Council
2373 NW 185th Avenue #310
Hillsboro OR 97124
gmarshall@corbantechnologies.com

Randy Linderman
Pacific Northwest Payphone
PMB 300
2373 NW 185th Avenue
Hillsboro OR 97124-7076
rlinderman@gofirestream.com

Kelly Mutch
PriorityOne Telecommunications Inc
PO Box 758
La Grande OR 97850-6462
managers@p1tel.com

Bryan Conway
Public Utility Commission of Oregon
PO Box 2148
Salem OR 97308-2148
bryan.conway@state.or.us

Michael Dougherty
Public Utility Commission of Oregon
PO Box 2148
Salem OR 97308-2148
michael.dougherty@state.or.us

Patrick L Phipps
QSI Consulting Inc
3504 Sundance Dr
Springfield IL 62711

Alex M Duarte
QWEST Corporation
310 SW Park Ave 11th Fl
Portland OR 97205-3715
alex.duarte@qwest.com

Mark Reynolds
QWEST Corporation
1600 7th Ave Rm 3206
Seattle WA 98191
mark.reynolds3@qwest.com

Diane Browning
Sprint Communications Co LP
3450 Sprint PKWY
Overland Park KS 66251
diane.c.browning@sprint.com

Kenneth Schiffman
Sprint Communications Co LP
3450 Sprint PKWY
Overland Park KS 66251
kenneth.schiffman@sprint.com

Kristin L Jacobson
Sprint Nextel
201 Mission St Ste 1500
San Francisco CA 94105
kristin.l.jacobson@sprint.com

Dave Conn
T-Mobile USA Inc
12920 E 38th St
Bellevue WA 98006
dave.conn@t-mobile.com

Lyndall Nipps
TW Telecom of Oregon LLC
9665 Granite Ridge Dr Ste 500
San Diego CA 92123
lyndall.nipps@twtelecom.com

Barbara Young
United Telephone Company of the Northwest
902 Wasco St ORHDRA0305
Hood River OR 97031
barbara.c.young@centurylink.com

Adam Haas
WSTC
10425 SW Hawthorne LN
Portland OR 97225
adamhaas@convergecomm.com

Rex M Knowles
XO Communications Services Inc
7050 Union Park Ave Ste 400
Midvale UT 84047
rexknowles@xo.com

DATED this 25th day of January, 2011.



Douglas R. Holbrook, OSB #872576
Holbrook & Seifert LLC
PO Box 2087
Newport, OR 97365
T (541) 265-2080 F (541) 265-2131
doug@lawbyhs.com

Copy to:

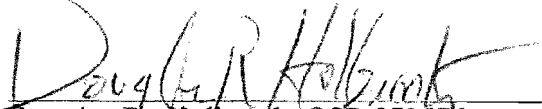
Joan S. Kelsey OSB #943566
PO Box 520
Tillamook, OR 97141
T (503) 842-2349 F (503) 842-4619
jskelsey@abovethefoglaw.com

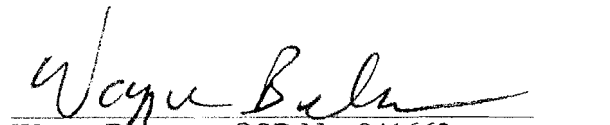
to route intrastate Internet traffic only in Oregon, increasing the reliability and speed of that traffic. See Parker 100/5-6, and Exhibits 101-104. This would greatly enhance applicant's broadband service quality and competitiveness, and should be part of the Stipulated Condition 13.

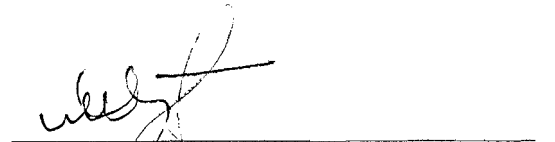
CONCLUSION

There is no credible testimony supporting the current version of Condition 26, and it should be revised to adequately address the network reliability problems in the Coastal Intervenor's geographic areas. Parker Telecommunications second merger condition should be adopted as part of Condition 13.

Dated this 25th day of January, 2011.


Douglas R. Holbrook, OSB 872576
Holbrook & Seifert LLC
Special Counsel to Petitioner Lincoln City
Attorney for Parker Telecommunications
PO Box 2087, Newport OR 97365
(541) 265-2080 Fax (541) 265-2131
doug@lawbyhs.com


Wayne Belmont, OSB No. 841662
Lincoln County Counsel
225 W Olive Street, #101 Newport OR 97365
(541) 265-4108 Fax (541) 265-4176
wbelmont@co.lincoln.or.us


William Sargent, OSB 891678
Tillamook County Counsel
1134 Main Avenue, Tillamook OR 97141
(503) 842-4921 Fax (503) 842-8862
wsargent@oregoncoast.com

**CERTIFICATE OF SERVICE
UM 1484**

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1484 on the following named person(s) on the date indicated below by email and U.S. Mail addressed to said person(s) at his or her last known address(es) indicated below.

Michel Singer Nelson
360Networks(USA) Inc
370 Interlocken Blvd Ste 600
Broomfield CO 80021-8015

5454 W 110th St KSOPKJ0502
Overland Park KS 66211
john.felz@centurylink.com

Penny Stanley
360Networks(USA) Inc
370 Interlocken Blvd Ste 600
Broomfield CO 80021-8015
penny.stanley@360.net

Rhonda Kent
Centurylink
805 Broadway 8th Floor
Vancouver WA 98660
ronda.kent@centurylink.com

Arthur A Butler
Atter Wynne LLP
601 Union Street, Ste 1501
Seattle WA 98101-3981
aab@aterwynne.com

William E Hendricks
Centurylink, Inc.
805 Broadway St
Vancouver WA 98660-3277
tre.hendricks@centurylink.com

Joel Paisner
Atter Wynne LLP
601 Union Street, Ste 1501
Seattle WA 98101-2327
jrp@aterwynne.com

Michael R Moore
Charter Fiberlink OR - CCVII LLC
12405 Powercourt Dr
St Louis MO 63131
michael.moore@chartercom.com

Richard Stevens
Central Telephone Inc
PO Box 25
Goldendale WA 98620
rstevens@gorge.net

Gordon Feighner
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97208
gordon@oregoncub.org

John Felz
Century Farm Court
1 – CERTIFICATE OF SERVICE

William K. Sargent
Tillamook County Counsel
1134 Main Avenue
Tillamook, OR 97141
(503) 842-4921
wsargent@oregoncoast.com

Robert Jenks
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97208
bob@oregoncub.org

G. Catriona McCracken
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97208
catriona@oregoncub.org

Raymond Myers
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97208
ray@oregoncub.org

Kevin Elliott Parks
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97208
kevin@oregoncub.org

Marsha Spellman
Converge Communications
10425 SW Hawthorne LN
Portland OR 97225
marsha@convergecomm.com

Frank G Patrick
Corporate Lawyers PC
PO Box 231119
Portland OR 97281
fgplawpc@hotmail.com

Katherine K. Mudge
Covad Communications Co
2 – CERTIFICATE OF SERVICE

7000 N Mopac Expwy 2nd Fl
Austin TX 78731
kmudge@covad.com

K C Halm
Davis Wright Tremaine LLP
1919 Pennsylvania Ave NW 2nd Fl
Washington DC 20006-3458
kchalm@dwt.com

Gregory J. Kopta
Davis Wright Tremaine LLP
1201 Third Ave Ste 2200
Seattle WA 98101-1688
gregkopta@dwt.com

Mark P Trincherro
Davis Wright Tremaine LLP
1300 SW Fifth Ave Stee 2300
Portland OR 97201-5682
marktrincherro@dwt.com

Jason W Jones
Department of Justice
Regulated Utility & Business Section
1162 Court Street NE
Salem OR 97301-4096
jason.w.jones@state.or.us

Edwin B Parker
Economic Development Alliance
PO Box 402
Gleneden Beach OR 9788
edparker@teleport.com

Judith Endejan
Graham & Dunn PC
2801 Alaskan Way, Suite 300
Seattle WA 98121
jendejan@grahamdunn.com

William K. Sargent
Tillamook County Counsel
1134 Main Avenue
Tillamook, OR 97141
(503) 842-4921
wsargent@oregoncoast.com

Gregory Merz
Gray Plant Mooty
500 IDS Center
80 S Eighth St
Minneapolis MN 55402
gregory.merz@gpmlaw.com

Karen L. Clauson
Integra Telcom Inc
6160 Golden Hills Dr
Golden Valley MN 55416-1020
klcauson@integratelecom.com

Greg L. Rogers
Level 3 Communications LLC
1025 Eldorado Blvd
Broomfield CO 80021
greg.rogers@level3.com

David Hawker
City of Lincoln City
801 Sw Highway 101
Lincoln City or 97367
davidh@lincolncity.org

Wayne Belmont
Lincoln County Counsel
225 W Olive Street
Newport OR 97365
wbelmont@co.lincoln.or.us

Adam Lowney
McDowell Rackner & Gibson PC
419 SW 11th Ave Ste 400
Portland OR 97205
adam@mcd-law.com

Wendy McIndoo
McDowell Rackner & Gibson PC
419 SW 11th Ave Ste 400
3 – CERTIFICATE OF SERVICE

Portland OR 97205
wendy@mcd-law.com

Lisa F Rackner
McDowell Rackner & Gibson PC
419 SW 11th Ave Ste 400
Portland OR 97205
lisa@mcd-law.com

Randy Linderman
Pacific Northwest Payphone
1315 Nw 185th Ave Ste 215
Beaverton or 97006-1947
rlinderman@gofirestream.com

Kelly Mutch
PriorityOne Telecommunications Inc
PO Box 758
La Grande OR 97850-6462
managers@p1tel.com

Bryan Conway
Public Utility Commission of Oregon
PO Box 2148
Salem OR 97308-2148
bryan.conway@state.or.us

Michael Dougherty
Public Utility Commission of Oregon
PO Box 2148
Salem OR 97308-2148
michael.dougherty@state.or.us

Patrick L Phipps
QSI Consulting Inc
3504 Sundance Dr
Springfield IL 62711

Alex M Duarte

William K. Sargent
Tillamook County Counsel
1134 Main Avenue
Tillamook, OR 97141
(503) 842-4921
wsargent@oregoncoast.com

QWEST Corporation
310 SW Park Ave 11th Fl
Portland OR 97205-3715
alex.duarte@qwest.com

Mark Reynolds
QWEST Corporation
1600 7th Ave Rm 3206
Seattle WA 98191
mark.reynolds3@qwest.com

Diane Browning
Sprint Communications Co LP
3450 Sprint PKWY
Overland Park KS 66251
diane.c.browning@sprint.com

Kenneth Schiffman
Sprint Communications Co LP
3450 Sprint PKWY
Overland Park KS 66251
kenneth.schiffman@sprint.com

Kristin L Jacobson
Sprint Nextel
201 Mission St Ste 1500
San Francisco CA 94105
kristin.l.jacobson@sprint.com

Dave Conn
T-Mobile USA Inc
12920 E 38th St
Bellevue WA 98006
dave.conn@t-mobile.com

Lyndall Nipps
TW Telecom of Oregon LLC
9665 Granite Ridge Dr Ste 500
San Diego CA 92123
lyndall.nipps@twtelecom.com

William Sargent
Tillamook County
1134 Main Avenue
Tillamook OR 97141
wsargent@oregoncoast.com

Barbara Young
United Telephone Company of the Northwest
902 Wasco St ORHDRA0305
Hood River OR 97031
barbara.c.young@centurylink.com

Adam Haas
WSTC
10425 SW Hawthorne LN
Portland OR 97225
adamhaas@convergecomm.com

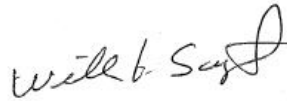
4 – CERTIFICATE OF SERVICE

William K. Sargent
Tillamook County Counsel
1134 Main Avenue
Tillamook, OR 97141
(503) 842-4921
wsargent@oregoncoast.com

Rex M Knowles
XO Communications Services Inc
7050 Union Park Ave Ste 400

Midvale UT 84047
rexknowles@xo.com

DATED this 25th day of January, 2011.



William K. Sargent, OSB# 891678
Tillamook County Counsel
1134 Main Avenue
Tillamook, OR 97141
Telephone: (503) 842-4921
Facsimile: (503) 842-8862
Email: wsargent@oregoncoast.com

5 – CERTIFICATE OF SERVICE

William K. Sargent
Tillamook County Counsel
1134 Main Avenue
Tillamook, OR 97141
(503) 842-4921
wsargent@oregoncoast.com