



OREGON
TELECOMMUNICATIONS
ASSOCIATION

July 2nd, 2012

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: Connect America Fund, WC Docket no. 10-90 and High Cost Universal
Service Support, WC Docket no 05-337

Ms. Dortch:

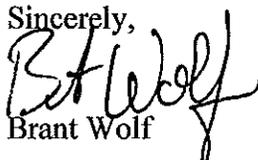
On June 1st, 2012 the Federal Communications Commission (FCC) issued a public notice requesting comment on data specifications for collecting study area boundaries. The Oregon Telecommunications Association (OTA) is a statewide trade association representing Incumbent Local Exchange Carriers (ILECS) in Oregon. The OTA believes that accurate service area boundaries will be essential to the proper execution of certain aspects of the Connect America Fund (CAF). The OTA believes that the Oregon Public Utility Commission (OPUC) has a key role to fill in the process of determining accurate service area boundaries of ILECs operating in Oregon.

The FCC states in the public notice "To the extent there are apparent conflicts in various data sources, we propose in the first instance to seek input from the relevant state public utility commission regarding the location of the relevant boundary." The OTA fully supports OPUC action to resolve any disputes related to study area boundaries.

The OPUC is currently in the process of creating a master statewide map of ILEC boundaries. Additionally, the OTA maintains a map of ILEC exchange boundaries. It is in the public interest for the OTA and OPUC to work together to submit verifiably accurate mapping information to the FCC. By working together, OTA and OPUC will be able to produce the most accurate mapping information possible.

The OTA believes that the OPUC is well positioned to assist ILECs by collecting mapping data, resolving conflicts and certifying the accuracy of boundaries to the FCC. The OTA has consulted with OPUC Staff and while these comments do not reflect any official policy, we believe that OPUC Staff agrees with them in principle.

Sincerely,


Brant Wolf