

Utah Rural Electric Association

**10714 South Jordan Gateway
South Jordan, Utah 84095
(801) 619-6550**

A Touchstone Energy™ Cooperative 

*Dixie Escalante REA Flowell Electric Garkane Energy Moon Lake Electric Wells Rural Electric
Bridger Valley Electric Empire Electric Mt. Wheeler Power Raft River Electric
Deseret Generation and Transmission Uintah Basin Telephone*

March 31, 2004

Utah Public Service Commission
160 East 300 South
Salt Lake City, Utah 84111

RE: Docket No. 04-999-03

Commissioners:

In response to the Commission's Notice of Further Agency Action and Scheduling issued March 19, 2004 on the matter of pole attachments, the Utah Rural Electric Association (UREA) and the rural electric systems serving Utah look forward to participating in discussions concerning pole attachments. We are particularly interested in the review and consideration of a possible exemption for rural electric cooperatives from pole attachment regulations.

Generally Utah's Rural Electric Cooperatives (RECs) have had amicable relationships with other companies desiring to attach to our distribution power poles. For many years Utah's RECs have negotiated pole attachments with established Telecom companies to bring adequate phone service to rural parts of the state. In many instances our electric cooperatives and the telephone cooperatives attaching to our poles serve the same customers/members. Nevertheless, we must always ensure that there is not subsidization of any particular service at the expense of our co-op members.

We are troubled by companies that have made unauthorized attachments to our poles in what could be described as competitive attempts to bring in services as quickly and inexpensively as possible. In these instances providers may not install correct anchoring, fail to compute stress levels on poles, and violate clearance standards. This results in the owners of the poles – the cooperative's members – subsidizing other companies seeking a quick profit. In addition, we often encounter companies that abandon their facilities on our poles, burdening the cooperative members with the cleanup expense.

We appreciate the opportunity to comment on this issue and look forward to participating in future dialogue regarding pole attachments.

Sincerely,

Michael Peterson
Executive Director