

July 22, 2008

Julie Orchard
Commission Administrator
Utah Public Service Commission
160 East 300 South
Heber M Wells Building, 4th Floor
Salt Lake City, Utah 84145

Re: State Certification of Rural Carriers' Compliance with 47 U.S.C. Section 254(e)

Dear Ms. Orchard:

Pursuant to the Federal Communications Commission ("FCC") mandate in its docket In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45/CC Docket No. 00-256, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45 and Report and Order in CC Docket No. 00-256 (FCC 01-157) (released May 23, 2001), the FCC has adopted a requirement codified at 47 C.F.R. §54.314 that state commissions must file an annual certification with the Universal Service Administrative Company ("USAC") and the FCC for rural incumbent local exchange carriers stating "...that all federal high-cost support provided to such carriers will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended."

Accordingly, Citizens Telecommunications Company of Utah, d/b/a Frontier Communications of Utah (Exchange Carrier Study Area Code 504429), is a rural incumbent local exchange carrier that has previously been designated by this Commission as an eligible telecommunications carrier. Citizens Telecommunications Company of Utah is complying with the requirements of Section 254(e) and will continue to comply for the period January 1, 2009 through December 31, 2009 (the certification period) to be eligible to receive federal USF. The Company certifies to the Commission that it will use all federal high-cost support provided to it only for the provision, maintenance and upgrading of facilities and services for which the support is intended consistent with the principles of universal service 47 U.S.C. 254. This includes, but is not limited to, trying to meet the goal of the provision of services that are properly supported by the high-cost funds at rates that are reasonably comparable to rates charged for similar services in urban areas.

This is a very critical issue, because if certification is not accomplished by October 1, 2008, then federal support for universal service in the areas served by the rural

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carriers within Utah will not be provided for at least the first quarter of 2009 (See paragraph 191 of FCC Order). Accordingly, replacement revenues would become necessary. Any loss of federal support would be a negative outcome for the rural carriers, their subscribers and the Commission.

In view of the limited time available, Citizens Telecommunications Company of Utah requests the Commission issue a certification before October 1, 2008 to USAC and the FCC that the Company is eligible to receive Federal USF and is in compliance with the FCC order.

Sincerely,

A handwritten signature in black ink that reads "Curt Huttsell". The signature is written in a cursive style with a large initial "C".

Curt Huttsell, Ph.D.

Manager, Government and External Affairs