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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Lifeline Rulemaking) DOCKET NO. 14-999-06
Docket)
) COMMENTS OF UTAH RURAL
) TELECOM ASSOCIATION ON THE
) PROPOSED RULE AMENDMENTS
) TO UTAH ADMIN. CODE R746-341
)

On April 9, 2014, the Utah Public Service Commission (the “Commission”) issued a Notice of Additional Comment Period, allowing interested parties to submit additional comments regarding proposed amendments to Utah Admin. Code R746-341 (the “Notice”) following the technical conference.

Utah Rural Telecom Association (“URTA”) on behalf of its members All West Communications, Inc., Bear Lake Communications, Inc., Carbon/Emery Telcom, Inc., Central Utah Telephone, Inc., Direct Communications Cedar Valley, LLC, Emery Telephone, Manti Telephone Company, Skyline Telecom, South Central Utah Telephone Association, Inc., Strata Networks, and Union Telephone Company, hereby files these comments to address a question raised by the Commission at the Technical Conference. Specifically, John Harvey of the Commission staff asked the parties present whether, under Federal Rules, the State

Administrator is required to perform the annual recertification for ETCs.

URTA has reviewed the Federal Rules contained in 47 C.F.R. §54.410. 47 C.F.R.

§54.410(f)(3) provides:

(3) Where a state Lifeline administrator or other state agency is responsible for re-certification of a subscriber's Lifeline eligibility, the state Lifeline administrator or other state agency must confirm a subscriber's current eligibility to receive a Lifeline service by:

- (i) Querying the appropriate eligibility databases, confirming that the subscriber still meets the program-based eligibility requirements for Lifeline, and documenting the results of that review; or
- (ii) Querying the appropriate income databases, confirming that the subscriber continues to meet the income-based eligibility requirements for Lifeline, and documenting the results of that review; or
- (iii) Obtaining a signed certification from the subscriber that meets the certification requirements in paragraph (d) of this section.

URTA believes that this language does not require State Administrators to undertake re-certification, but rather, sets forth the procedures that a State Administrator is required to take annually *if* it has undertaken the responsibility for re-certification of eligible subscribers. In other words, if the State Administrator is responsible for re-certification of eligible subscribers, then it must perform such re-certification annually. URTA believes it is possible, under Federal Rules, for the State Administrator to determine that it will not undertake such responsibilities for “Federal only” ETCs.

URTA does not have additional comments in this matter at this time, but incorporates its previously filed Comments

Respectfully submitted this 22nd day of April, 2014.

BLACKBURN & STOLL, LC

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Association

CERTIFICATE OF SERVICE
Docket No. 10-2528-01

I hereby certify that on the 22nd day of April, 2014, I served a true and correct copy of Utah Rural Telecom Association's Comments On the On-Going Administration of the Lifeline Program via e-mail transmission to the Public Service Commission Distribution list in this docket and the following persons at the e-mail addresses listed below:

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