



July 30, 2018

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Mr. Gary Widerburg  
Commission Administrator  
Public Service Commission of Utah  
Heber M. Wells Building  
160 East 300 South, Fourth Floor  
Salt Lake City, Utah 84111

RE: Docket 18-999-12 - 2018 Universal Service Fund (USF) CAF ICC Review

Dear Mr. Widerburg:

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) and in its docket In the Matter of Connect America Fund, et al, WC Docket No. 10-90, WC Docket No 14-58 et al, Report and Order and Further Notice of Proposed Rulemaking (FCC 11-161) (released May 18, 2011), 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 within that state was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which the support is intended."

Accordingly, Citizens Telecommunications Company 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, 2019 through December 31, 2019 (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.

Citizens Telecommunications Company of Utah requests the Commission issue a certification before October 1, 2018 to the Universal Service Administrative Company (USAC) and the FCC, pursuant to 47 CFR 54.314(a) that the Company is eligible to receive Federal USF and is in compliance with the FCC's order.

July 30, 2018  
Page 2

Any questions or notifications pertaining to this filing should be directed to me at 972-908-4415 or by email at [kimberly.a.douglass@ftr.com](mailto:kimberly.a.douglass@ftr.com).

Respectfully submitted,

A handwritten signature in black ink that reads "Kim Douglass". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Kim Douglass  
Manager - Regulatory Affairs

cc: Carl Erhart