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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Resolution of Certain) DOCKET NO. 10-2528-01
Issues Related to the Designation of a)
Common Carrier as an Eligible) REPLY COMMENTS OF UTAH
Telecommunications Carrier) RURAL TELECOM ASSOCIATION
) ON THE DIVISION OF PUBLIC
) UTILITIES' LIFELINE PROPOSAL
)

On May 20, 2013, the Utah Public Service Commission (the "Commission") issued a Notice of Filing and Comment Period Order in this docket which identified June 3, 2013 as the deadline for filing Comments on the Lifeline Proposal Memorandum filed by the Division of Public Utilities (the "Division") on May 10, 2013, and identified June 10, 2013 as the deadline for filing Reply Comments on the Division Proposal. Utah Rural Telecom Association ("URTA") filed Comments on June 3, 2013, and incorporates by reference those Comments herein. These Reply Comments are filed by URTA to address the Letter from the Department of Workforce Services ("DWS") dated May 30, 2013 ("DWS Letter") that was provided by the Commission to the interested parties in this docket on June 4, 2013. As the Commission is aware, the DWS Letter provided written Notice of Termination of the Utah Telephone Assistance Program Memorandum of Agreement. The DWS Letter provided that

pursuant to Paragraph 4 of “Attachment A¹,” the contract is terminated as of August 31, 2013.

URTA and its members are extremely concerned that terminating the DWS’s administration of the Utah Telephone Assistance Program as of August 31, 2013 will have disastrous repercussions for the Lifeline Program, Lifeline participants, and the wireline carriers in the State of Utah. As indicated in URTA’s previous Comments, the rural carriers are concerned generally with the administration of the Lifeline program being transferred to the carriers due to privacy concerns within the rural communities. URTA and its members believe that rural carrier administration of the Lifeline program will have a chilling effect on rural community members’ participation in the Lifeline program.

More specifically now, however, URTA and its members do not believe that the administration of the Lifeline program can, or should, be transitioned to the rural carriers by August 31, 2013. The URTA members simply do not have the experience, expertise, or manpower to assume administration of the Lifeline program in the next two and a half months. As a practical matter the carriers simply do not have the time or resources to design and implement the internal processes necessary to develop, accept, verify and process Lifeline applications by August 31, 2013. Additionally, as suggested by CenturyLink, fewer than 90 days is not enough time to develop and implement the new application processes and to properly inform potential subscribers as to the changes in the Lifeline program.

Additionally, as pointed out by CenturyLink in its reply comments, if the DWS is permitted to terminate its administration of the Lifeline program as of August 31, 2013, the change will take place in the middle of the recertification of wireline Lifeline participants. The timing of these changes could not be worse, and will place a substantial burden on the

¹ Attachment A was not provided to the interested parties by the Commission.

Commission, the Division, and the carriers, and will negatively impact the Lifeline participants and potential participants. URTA and its members believe it is in the best interests of the Lifeline participants, the Commission and the carriers to take whatever legal steps are necessary to delay DWS's termination of its administration of the Lifeline program.

As previously stated URTA and its members are in favor of the State centrally managing the administration of the Lifeline program, including the initial eligibility verification and the ongoing verification or recertification on behalf of the ETCs. The URTA Members believe that the State is in the best position to administer the Lifeline program in a timely and cost effective manner, and that the state should continue to administer the Lifeline program. The URTA members do not believe it is in the best interests of the Lifeline program, or the participants to transition administration of the Lifeline program to the carriers. Clearly, however, if the State were to consider such a transition, it should be implemented in a reasonable time frame to allow the carriers to establish the proper procedures and forms, to hire and train the appropriate staff members, and to permit time to educate potential and current participants in the Lifeline program as to the changes being implemented. Certainly, a rushed transition of the administration of the Lifeline program to the carriers is not in the best interest of the public or the Lifeline program participants.

Conclusion

URTA and its members urge the Commission to take whatever legal steps are necessary to delay DWS's termination of its administrative services related to the Lifeline program.

Respectfully submitted this 10th day of June, 2013.

BLACKBURN & STOLL, LC

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Association

CERTIFICATE OF SERVICE
Docket No. 10-2528-01

I hereby certify that on the 10th day of June, 2013, I served a true and correct copy of Utah Rural Telecom Association's Comments On the Division of Public Utilities Proposal via e-mail transmission to the following persons at the e-mail addresses listed below:

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