

Stephen F. Mecham (4089)  
Callister Nebeker & McCullough  
10 East South Temple, Suite 900  
Salt Lake City, Utah 84133  
Telephone: 801 530-7300  
Fax: 801 364-9127  
Email: sfmecham@cnmlaw.com  
*Attorneys for the Utah Rural Telecom Association*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Resolution of Certain Issues Related to the Designation of a Common Carrier as an Eligible Telecommunications Carrier	Docket No. 10-2528-01  COMMENTS OF THE UTAH RURAL TELECOM ASSOCIATION
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In accordance with the Amended Interim Scheduling Order issued in this docket May 2, 2011, the Utah Rural Telecom Association (“URTA”) provides the following comments:

**1. Outreach**

The Commission asks parties to comment on the possibility of the Commission providing outreach for the Lifeline program rather than individual Eligible Telecommunications Carriers providing outreach. URTA believes centralized outreach by the Commission is an issue the Commission should pursue and analyze as part of this docket. It seems that it would be more efficient for the Commission to do the outreach similar to the outreach it does for Relay Utah. If outreach is centralized, the outreach should be clear on the qualifications for the program and the procedures for enrollment.

**2. Interim Procedures/Issues for June 1<sup>st</sup> Technical Conference**

The prepaid wireless ETC applications have put the cart before the horse. They are seeking to provide Lifeline service before an expanded certification and verification program

required to prevent fraud is in place. URTA urges caution against moving forward too quickly. The series of technical conferences URTA recommended in the May 12<sup>th</sup> comments should begin immediately and address this issue.

In the May 2<sup>nd</sup> scheduling order, the Commission also inquires what issues parties should discuss at the June 1, 2011 technical conference in this proceeding. URTA believes possible interim procedures to prevent fraud should be the principal issue for discussion at the technical conference if the Commission intends to move forward before the issues required to be resolved in this docket are resolved.

Respectfully submitted this 25<sup>th</sup> day of May, 2011.

Callister Nebeker & McCullough

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Stephen F. Mecham

## Certificate of Service

I hereby certify that a true and correct copy of the foregoing comments of URTA was served by email this 25th day of May, 2011, on the following:

Brett L. Tolman  
RAY QUINNEY & NEBEKER P.C.  
36 South State Street, Suite 1400  
Salt Lake City, Utah 84111  
BTolman@rqn.com

Paul Proctor  
Assistant Attorney General  
160 East 300 South, 5th Floor  
Heber Wells Building  
Salt Lake City, UT 84114-0857  
pproctor@utah.gov

Sherman Roquiere  
Department of Community & Culture  
324 South State St., Suite 500  
Salt Lake City, UT 84114-9302  
sroquiere@utah.gov

Gary A. Dodge  
Hatch James & Dodge  
10 West Broadw3ay, Suite 400  
Salt Lake City, UT 84101  
gdodge@hjdllaw.com

Cheryl Murray  
Utah Office of Consumer Services  
160 East 300 South, 2nd Floor  
P.O. Box 146782  
Salt Lake City, UT 84114-6782  
cmurray@utah.gov

Patricia Schmid  
Assistant Attorney General  
160 East 300 South, 5th Floor  
Heber Wells Building  
Salt Lake City, UT 84111  
pschmid@utah.gov

Alex M. Duarte  
310 SW Park Avenue, 11th Floor  
Portland, OR 97205  
alex.duarte@qwest.com

Mitchell F. Brecher  
Greenberg Traurig LLP  
2101 L. Street, NW, Suite 1000  
Washington, DC 20037  
brecherm@gtlaw.com

Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1720 Windward Concourse, Suite 115  
Alpharetta, Georgia 30005  
lsteinhart@telecomcounsel.com

Peter Lurie  
Elaine Divelbliss  
Virgin Mobile USA  
10 Independence Blvd.  
Warren, NJ 07059  
Peter.Lurie@virginmobileusa.com  
Elaine.Divelbliss@virginmobileusa.com.

Torry Somers  
CenturyLink  
6700 Via Austi Pkwy.  
Las Vegas, NV 89119  
torry.r.somers@centurylink.com

Kathy Kinsman  
Assistant Attorney General  
160 East 300 South, 5th Floor  
Salt Lake City, Utah 84114-0857  
kkinsman@utah.gov

/s/ Stephen F. Mecham