

Kira M. Slawson (7081)
 BLACKBURN & STOLL, LC
 257 East 200 South, Suite 800
 Salt Lake City, Utah 84111
 Telephone (801) 521-7900
kslawson@blackburn-stoll.com

Attorneys for Utah Rural Telecom Association
 and its Members

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH	
In the Matter of the 2019 Utah Universal Service Recommendations	JOINT REQUEST FOR ADDITIONAL COMMENTS AND PROCESS DOCKET NO. 18-040-01; 18-043-01; 18-046-01; 18-051-01; 18-052-01; 18-053-02; 18-054-01; 18-576-01; 18-2180-01; 18-2201-01; 18-2302-02; 18-2303-01; 18-2419-01

The Utah Rural Telecom Association (“URTA”), on behalf of itself and URTA members, All West Communications, Inc., Bear Lake Communications, Inc., Beehive Telephone Company, Carbon/Emery Telcom, Inc., Central Utah Telephone, Inc., Direct Communications Cedar Valley, LLC, Emery Telephone, Gunnison Telephone Company, Hanksville Telcom, Inc., Manti Telephone Company, Skyline Telecom, South Central Utah Telephone Association, Inc., UBTA-UBET Communications, Inc. dba Strata Networks, and Union Telephone Company (“Members” or “URTA Members”), together with the Division of Public Utilities (the “Division”) and the Office of Consumer Services (the “Office”) (collectively the “Parties”) hereby jointly request additional process in these dockets as permitted by the Scheduling Order issued by the Commission on October 12, 2018.

First, the Parties agree that a third round of Comments would permit the Parties to more fully respond to the issues raised by the other Parties and would allow the Parties to fully

develop the issues for the Commission. As a result, the Parties hereby request that the Scheduling Order be amended to provide for another round of Comments to be filed on November 29, 2018.

Second, the Parties have met and conferred on the excess deferred income tax (EDIT) issue including the method for “pay back” of the EDIT where it cannot offset UUSF. The Parties believe that the additional two weeks granted above for additional comments will permit the parties to reach a consensus on this issue. To the extent a consensus has been reached, the Parties can report such consensus in the third round of comments to be filed November 29, 2018. If the parties have not reached a consensus on this issue, the parties can request a scheduling order to request further process on that issue. The EDIT issue does not impact the UUSF determinations/recommendations and will not require any interim rates.

Third, the Parties believe that additional time and separate process may be required by the Union Telephone Company Comments. Once reply Comments have been filed, the Parties will have better understanding of the issue and can either address those issues in the third round of comments requested herein, or request a scheduling conference with the Commission to request further process on this issue.

Finally, it is the Parties understanding that the Division anticipates utilizing feedback from the Commission orders to make revised recommendations for UUSF. The Parties believe a more specific schedule for this process would be helpful.

CONCLUSION

The Parties hereby request that the current Scheduling Order be amended to allow the Parties the opportunity to file an additional round of Comments on the issues raised in these

dockets on or before November 29, 2018. If there are issues that require further process, the Parties will request a Scheduling Conference with the Commission to schedule such further process.

DATED this 15th day of November, 2018.

BLACKBURN & STOLL, LC



Kira M. Slawson
Attorneys for Utah Rural Telecom Association

/s/ Justin C. Jetter
Justin C. Jetter
Assistant Attorney General
Utah Division of Public Utilities

/s/ Steven Snarr
Assistant Attorney General
Office of Consumer Services

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Joint Request for Additional Comments and Process, Docket 18-040-01, et. al., was served the 15th of November, 2018 as follows:

DIVISION OF PUBLIC UTILITIES (by email)

Justin Jetter
jjetter@agutah.gov

Chris Parker
chrisparker@utah.gov

Bill Duncan
wduncan@utah.gov

OFFICE OF CONSUMER SERVICES (by email)

Robert Moore
rmoore@agutah.gov

Michele Beck
mbeck@utah.gov

Cheryl Murray
cmurray@utah.gov

Steven Snarr
stevensnarr@agutah.gov

Bruce Asay
Attorney for Union Telephone Company
basay@associatedlegal.com



Kira M. Slawson