David R. Irvine (1621) 747 East South Temple, Ste. 130 Salt Lake City, UT 84103 Telephone: (801) 579-0802 Facsimile: (801) 579-0801 E-mail: Drirvine@aol.com

Attorney for Direct Communications Cedar Valley, LLC

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

the second s	
))	Docket No. 20-2419-01
)	
)	Comments of Direct Communications,
)	Cedar Valley, LLC with Respect to
)	Recommendation by the Division of
)	Public Utilities, and Request for Hearing
))))))

Pursuant to Admin Code r.746-100-3, Direct Communications Cedar Valley, LLC ("DCCV" or "the Company" herein) responds to the Recommendation by the Utah Division of Public Utilities ("the Division" herein) in this matter submitted to the Commission on November 16, 2020 as follows:

1. DCCV does not object to the recoverable amount for UUSF purposes as proposed by the Division, insofar as it allows for at least partial recovery of DCCV's operational expenses; however, there is an ongoing disagreement between the Company and the Division with respect to a determination of the appropriate amount of management expense which should also be recovered for UUSF purposes. An adjustment made by the Division disallowed DCCV's management expense in its entirety.

2. Since November 16, 2020, the Company and the Division have been working to resolve any disputed matters. The Division filed its 4th set of Data Requests with DCCV on

December 10, 2020 (requesting expedited turn-around) and its 5th set of Data Requests on December 16, 2020 (requesting expedited turn-around).

3. DCCV responded to these additional Data Requests on December 17, 2020 and December 18, 2020, respectively. The parties have not had sufficient time to fully determine what matters with respect thereto remain at issue.

4. Inasmuch as December 18, 2020 is the last day for comments to be submitted to the Commission in this matter, DCCV requests that the matters in dispute between the parties be set for an evidentiary hearing, and that a scheduling conference be set on or after February 1, 2021 to arrange such further proceedings as may be necessary.

5. Counsel for the Company and counsel for the Division have conferred and discussed this schedule and concur as it is proposed.

DATED this 18th day of December, 2020.

/s/ David R. Irvine

David R. Irvine Attorney for Direct Communications Cedar Valley, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of December, 2020, I caused a true and correct copy of the foregoing Notice and Motion to be delivered by E-mail to the following:

> Justin C. Jetter Assistant Attorney General jjetter@agutah.gov

Patricia Schmid Assistant Attorney General pschmid@agutah.gov

Madison Galt Division of Public Utilities mgalt@utah.gov Alyson Anderson akanderson@utah.gov

Bela Vastag bvastag@utah.gov

Alex Ware aware@utah.gov

Office of Consumer Services ocs@utah.gov

Robert Moore Assistant Attorney General rmoore@agutah.gov

/s/ David R. Irvine