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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Universal Public) Rule 746-360
Telecommunications Service Support Fund)
) COMMENTS OF UTAH RURAL
) TELECOM ASSOCIATION ON THE
) PROPOSED RULE AMENDMENTS
) TO UTAH ADMIN. CODE R746-360
)

On May 14, 2015, the Utah Public Service Commission (the “Commission”) issued a Notice of Proposed Rule Amendment for R746-360. The Notice of Proposed Rule Amendment provided that Comments on the proposed amendments to R746-360 are due on or before July 1, 2015.

Utah Rural Telecom Association (“URTA”) on behalf of its 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, Manti Telephone Company, Skyline Telecom, South Central Utah Telephone Association, Inc., UBTA-UBET Communications Inc. (dba Strata Networks), and Union Telephone Company, hereby files these comments in support of the proposed Rule Amendment.

According to the Public Service Commission, the purpose of the proposed rule change is “to clearly reflect in the rule the Commission’s existing practice, which is to protect the public interest and ensure the efficient use of USF [Universal Public Telecommunications Service Support Fund] funds by denying recovery of costs whenever the Commission finds reimbursement would result in an inefficient use of the funds or otherwise be contrary to the public interest.” (*See Notice of Proposed Rule Amendment, ¶6*).

URTA has reviewed the proposed amendment for R746-360 and concurs that the proposed changes properly reflect the Commission’s long-standing existing practice of reviewing and auditing all USF requests from qualifying telecommunications corporations to determine that the costs for which reimbursement is sought, in each application, are reasonable and prudent costs incurred by the qualifying telecommunications corporations in providing basic telecommunications service at just, reasonable, and affordable rates, and that the USF funds are used efficiently and in the public interest.

Because the proposed amendment to R746-360 serves to clarify the existing practice, URTA supports the Amendment to R746-360 proposed by the Commission.

Respectfully submitted this 1st day of July, 2015.

BLACKBURN & STOLL, LC

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Association

CERTIFICATE OF SERVICE
Proposed Amendment to R746-360

I hereby certify that on the 1st day of July, 2015, I served a true and correct copy of Utah Rural Telecom Association's Comments on the Proposed Amendment to Rule R746-360 via e-mail transmission to the Public Service Commission Distribution list in this docket and the following persons at the e-mail addresses listed below:

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