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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Potential
Amendments to R746-100-3

DOCKET NO. 16-R100-01

CENTURYLINK'S COMMENTS

On April 8, 2016, the Utah Public Service Commission (“PSC”) issued a Request for Comments in this proceeding, where it is considering potential amendments to R746-100-3 that would (1) eliminate the requirement to file paper copies, and (2) allow electronic-only filings. Additionally the PSC invites “*comments about other options that may exist to simplify filing and service requirements.*” Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”) respectfully submits its comments.

CenturyLink supports the PSC’s efforts to simplify filing and service requirements. In today’s environment, where the use of email and electronic documents is widespread and generally accepted, it makes sense to allow the filing of documents on an electronic basis without the filing of paper copies.¹ The PSC already allows electronic-only documents for some types of

¹ In most cases, providing electronic filing via email would be appropriate. However, in some situations—for example with very large files—emailing may not be practical. In other situations a party may not want to email an electronic copy of highly confidential material. Therefore, the rule needs to be flexible and allow, in addition to email, other ways to provide electronic copies, such as use of a CD or a flash/thumb/jump drive, that is mailed or hand delivered.

filings,² and allowing electronic-only documents for all filings will significantly simplify the Utah regulatory filing process, saving time and money for both filers and the Commission. While electronic filing should be encouraged, the PSC rules should still allow paper copies to be filed in certain situations.³

Attachment A provides an outline of guidelines/concepts that CenturyLink believes the PSC should adopt in its rules. Attachment B provides a redline document with CenturyLink's recommended changes to R746-100-3 and R746-100-16.

For the above stated reasons, CenturyLink respectfully requests that the Commission change its rules to facilitate electronic only filings in almost all situations and to make the other recommended changes.

RESPECTFULLY SUBMITTED this 11th day of May, 2016

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²The PSC website link (<http://www.psc.utah.gov/filingrequirements.html>) provides the filing requirements. For telecommunication filings, miscellaneous and price list filings are only filed electronically.

³ Public comments and formal complaints, in situations where a party does not have access to email, are examples of when the PSC may need to allow the filing of paper copies.