



CARLA M. BUTLER

July 13, 2017

Via Electronic Filing Only

Gary Widerburg
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111
psc@utah.gov

Re: Docket No. 17-R008-01

Dear Mr. Widerburg:

Attached for filing in the above entitled docket please find CenturyLink's Request for Additional Time to File Comments and Reply Comments, along with a Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Carla".

Carla Butler
Lead Paralegal

Attachment
cc: Service List

310 SW Park Ave., 11th Fl.
Portland, OR 97205
Tel. 503.242.5420
Fax. 503.242.8589
carla.butler@centurylink.com

Torry R. Somers
CenturyLink
6700 Via Austi Pkwy.
Las Vegas, NV 89119
Ph: (702) 244-8100
Fax: (702) 244-7775
torry.r.somers@centurylink.com

Attorney for CenturyLink

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Utah Administrative
Code R746-8, Proposing to Repeal R746-
360, R746-341, and R746-343

DOCKET NO. 17-R008-01

**REQUEST FOR ADDITIONAL TIME TO FILE COMMENTS AND REPLY
COMMENTS**

Qwest Corporation d/b/a CenturyLink QC and CenturyLink Communications, LLC (“CenturyLink”) respectfully request the Public Service Commission of Utah (“Commission”) give all interested parties additional time to file comments and reply comments in Docket 17-R008-01. Additional time is needed to address the many issues identified in the Commission’s July 5, 2017 Notice of Proposed Rulemaking (the “R008 Notice”). There is less urgency in this Docket now that the Commission delayed the implementation of the Utah Universal Service Fund (“UUSF”) surcharge mechanism until January 1, 2018. Further, deciding the issues in this docket prior to resolving the surcharge mechanism may cause additional harm, and unnecessary burdens on the UUSF.

On March 27, 2017, in reference to the passage of Senate Bill 130, the Commission opened Docket No. 17-R360-01. SB 130 requires the Commission to adopt a rule establishing the UUSF surcharge methodology before January 1, 2018, as well as address other UUSF and lifeline issues. The Commission recognized the importance of establishing the method for UUSF

collections, and recognized it was a priority to address that issue, as it was the only issue that had a statutory time constraint.¹

Subsequently, on May 16, 2017, the Commission issued a Notice of Rulemaking, seeking to move forward with a rule change that will fund the UUSF through a per-connection surcharge rather than through a revenue-based remittance. Pursuant to the Notice of Rulemaking, the rule was to take effect on August 1, 2017. On July 5, 2017, the Commission issued a Notice of Intent to Delay Effective Date. Specifically, the Commission is delaying the implementation of any rule to implement a per-connection surcharge as the funding mechanism for the UUSF from August 1, 2017 to January 1, 2018. On the same day the Commission delayed the implementation of the rule to implement a per-connection surcharge, it issued a Notice of Proposed Rulemaking and Request for Comments in this Docket (the “R008 Notice”).

The surcharge mechanism remains the only item from SB 130 that must be resolved by January 1, 2018. When the Commission developed the R008 Notice, it apparently was done with the assumption that the new surcharge mechanism would go into effect on August 1, 2017.² Given the delay in implementing the new surcharge mechanism, CenturyLink requests that the comment and reply comment periods in this Docket each be extended for at least 45 days. There are many issues to address in this rulemaking, and it would be beneficial to have more time for comments and reply comments, particularly since the Commission is requesting the parties provide draft language, in addition to comments.³ Further, to the extent the Commission moves forward with this rulemaking, without having resolved the surcharge mechanism, there is a risk

¹ Docket No. 17-R360-01, *Commission Request For Comments*, March 27, 2017, Footnote 1.

² *See*, R008 Notice, P. 2.

³ For example, in the Commission’s July 5, 2017 *Notice of Proposed Rulemaking and Request For Comments*, item 2 on page 3, most likely requires significant changes to CenturyLink’s billing system. At this time CenturyLink does not know how long it would take to modify the billing system to ensure that new Lifeline customers after a certain date could only receive the federal Lifeline discount and not the state Lifeline discount, at least in the interim until the National Verifier is in place for Utah. Centurylink needs adequate time to determine the time frame for implementation so that it can reflect this important information in its comments.

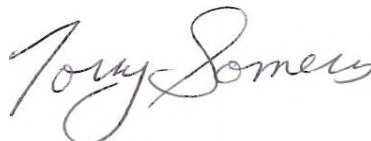
that the demands on the UUSF will significantly increase, without correspondingly fixing the underlying problem with the surcharge mechanism and those required to contribute to the UUSF.

Additionally, on July 12, 2017, in Docket No. 17-R360-01, the Commission granted CenturyLink's request for the opportunity to file reply comments which CenturyLink appreciates very much. However, the August 2, 2017, due date for reply comments now overlaps with the comments in this proceeding. As the Commission stated at the outset in Docket 17-R360-01, the priority should be a determination of the surcharge mechanism. Now that there is an opportunity to file reply comments in Docket 17-R360-01, the Commission would benefit from the parties focusing their attention on that issue, and then addressing the remaining issues in this docket.

Based on the foregoing, CenturyLink requests the August 2, 2017 comment deadline, and the August 17, 2017 reply comment deadline each be extended by at least 45 days.

RESPECTFULLY SUBMITTED this 13th day of July 2017.

CENTURYLINK



Torry R. Somers
6700 Via Austi Pkwy.
Las Vegas, NV 89119
Ph: (702) 244-8100
Fax: (702) 244-7775
torry.r.somers@centurylink.com

Attorney for CenturyLink

CERTIFICATE OF SERVICE
VIA EMAIL TRANSMISSION
Docket No. 17-R008-01

I hereby certify that on the 13th day of July, 2017, I caused a true and correct copy of the foregoing CENTURYLINK'S REQUEST FOR ADDITIONAL TIME to be served upon the following persons via electronic mail at the e-mail addresses shown below.

Public Service Commission:
psc@utah.gov

Utah Division of Public Utilities:
Justin Jetter – jjetter@utah.gov
Bill Duncan – wduncan@utah.gov
Chris Parker – chrisparker@utah.gov
Erika Tedder – etedder@utah.gov

Office of Consumer Service:
Michele Beck – mbeck@utah.gov
Cheryl Murray – cmurray@utah.gov

AT&T Companies
Gary A. Dodge – gdodge@hjdllaw.com

Utah Rural Telecom Association
Kira M. Slawson – kslawson@blackburn-stoll.com

CTIA - The Wireless Association
Benjamin J. Aron – baron@ctia.org
Matthew DeTura – mdetura@ctia.org

Comcast
Sharon M. Bertelsen – BertelsenS@ballardspahr.com
Jerold G. Oldroyd – OldroydJ@ballardspahr.com

Jive Communications, Inc.
Lance Brimhall – lbrimhall@jive.com

CENTURYLINK



By: Carla M. Butler, Paralegal
310 SW Park Ave., 11th Flr.
Portland, OR 97205
Telephone: 503-242-5420
Facsimile: 503-242-8589
e-mail: Carla.butler@centurylink.com