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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

<p><b>IN THE MATTER OF THE UTAH ADMINISTRATIVE CODE R746-8, PROPOSING TO REPEAL R746-360, R746-341, AND R746-343.</b></p>	<p>DOCKET NO. 17-R008-01</p> <p><b>UTAH DIVISION OF PUBLIC UTILITIES' RESPONSE IN SUPPORT OF CENTURYLINK'S REQUEST FOR ADDITIONAL TIME TO FILE COMMENTS AND REPLY COMMENTS</b></p>
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Pursuant to Utah Admin. Code r.746-100 the Utah Division of Public Utilities (“Division”) files this Response in support of CenturyLink’s Request for Additional Time to File Comments and Reply Comments (“Request”).

On July 5, 2017, the Public Service Commission of Utah (“Commission”) issued a request for comments in this docket regarding the repeal of certain administrative rules related to the Utah Universal Service fund. The Commission initially requested comments by August 2, 2017 and reply comments by August 17, 2017.

On July 13, 2017, CenturyLink filed its Request seeking to extend the comment and reply dates to September 18, 2017, and October 3, 2017 respectively. Utah Rural Telecom Association

filed a joinder to CenturyLink's Request. On July 14, 2017, the Commission issued a Scheduling Order providing a July 19, 2017 deadline for objection to CenturyLink's Request. On July 18, 2017, CITA filed a response supporting CenturyLink's Request.

CenturyLink's Request was based primarily on the extension of time before implementation of the surcharge funding mechanism in Docket No. 17-R360-01. CenturyLink noted that there is a risk that moving forward with the rulemaking in this docket might leave the UUSF with increased distributions without having sufficient revenue from the surcharge in place.

The Division supports CenturyLink's Request for additional time in this docket. The issues relating to the revenue collection in Docket No. 17-R360-01 are closely related to the outcome of this docket. The revenue collection model and initial rates for the UUSF should be finalized prior to the promulgation of new rules regarding UUSF payments. The risk of increased UUSF payments from the fund without corresponding revenue could lead to shortfall. The potential for litigation and delay in the UUSF surcharge docket further supports this position. Additionally, the primary current recipients of UUSF funds – URTA members – have joined CenturyLink in requesting the extension of comment periods in this docket.

For these reasons, the Division supports CenturyLink's Request for additional time to file comments in this docket.

Submitted this 19th day of July, 2017.

/s/ Justin C. Jetter

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