



CARLA M. BUTLER

February 14, 2018

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 Comments in Response to the UUSF R746-8 Rule Published in the State Bulletin on January 15, 2018, along with a Certificate of Service.

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

Sincerely,

A handwritten signature in cursive script that reads "Carla".

Carla Butler
Lead Paralegal

Attachment
cc: Service List

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Attorney for CenturyLink

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Utah Administrative Code R746-8, Proposing
To Repeal R746-360, R746-341, and R746-343
Telecommunications Service Support Fund

DOCKET NO. 17-R008-01
COMMENTS OF CENTURYLINK

**COMMENTS IN RESPONSE TO THE UUSF R746-8 RULE PUBLISHED IN THE STATE
BULLETIN ON JANUARY 15, 2018**

Qwest Corporation d/b/a CenturyLink QC and CenturyLink Communications, LLC (“CenturyLink”) appreciates the opportunity to file comments. On January 2, 2018, the Utah Public Service Commission (“Commission”), issued a Notice of Rule Filing and Notice of Scheduling Conference (“Notice”) in this proceeding. Attached to the Notice were proposed rules which have subsequently been published in the state bulletin on January 15, 2018.¹ In these comments, CenturyLink seeks clarification on one Lifeline issue.

In the published rule, section R746-8-403 Lifeline Support, broadband Lifeline and wireless Lifeline are specifically mentioned, but there is no mention of voice only landline based Lifeline customers. CenturyLink seeks clarification that voice only landline based Lifeline

¹ Utah State Bulletin, January 15, 2018, Vol. 2018 No. 2;
Website Link: https://rules.utah.gov/publicat/bull_pdf/2018/b20180115.pdf

customers will continue to receive Utah Lifeline support until such time when the federal Lifeline program no longer provides Lifeline support to voice only landline based Lifeline customers. CenturyLink believes that the Commission fully intends to have the Utah Lifeline program remain consistent with the federal Lifeline program because on page 4 of the Notice, the Commission referenced that the Utah statute, “*requires our Lifeline program to be consistent with the FCC program.*”² Unless there is clarification from the Commission that it does not intend to remain consistent with the FCC program, CenturyLink will continue to provide the \$3.50 monthly Utah Lifeline benefit to its qualified voice only landline based Lifeline customers, consistent with the federal Lifeline program.

CenturyLink supports making this rule effective with the requested clarification.

RESPECTFULLY SUBMITTED this 14th day of February, 2018.

CENTURYLINK



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² Utah Code 54-8b-15(15)(a), website link:
https://le.utah.gov/xcode/Title54/Chapter8B/54-8b-S15.html?v=C54-8b-S15_2017050920170701

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

I hereby certify that on the 14th day of February, 2018, I caused a true and correct copy of the foregoing CENTURYLINK'S COMMENTS IN RESPONSE TO THE UUSF R746-8 RULE PUBLISHED IN THE STATE BULLETIN ON JANUARY 15, 2018 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

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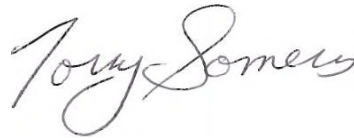
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