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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Utah Administrative Code ) Docket No. 17-R008-01  
R746-8, Proposing to Repeal R746-360, )  
R746-341 and R746-343 ) UTAH RURAL TELECOM  
 ) ASSOCIATION’S LIST OF ISSUES TO  
 ) BE DISCUSSED TECHNICAL  
 ) CONFERENCE MARCH 15, 2018 ON  
 ) ONE TIME DISTRIBUTIONS

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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, Gunnison Telephone Company, Manti Telephone Company, Skyline Telecom, South Central Utah Telephone Association, Inc., UBTA-UBET Communications Inc. (dba Strata Networks), and Union Telephone Company, hereby submits this List of Issues regarding One-Time Distributions from the Utah Universal Public Telecommunications Service Support Fund (“UUSF”) to be addressed at the Technical Conference to be held on March 15, 2018. This Issues List is being provided pursuant to the Utah Public Service Commission’s (“Commission”) Scheduling Order and Notice of Technical Conference issued on February 9, 2018.

URTA understands that the purpose of the Technical Conference is to discuss issues relating to one-time UUSF distributions so the Commission can establish administrative rules that would govern one-time distributions from the UUSF. URTA and its members believe that the rules governing one-time distributions should be flexible to allow deployment of technology and services in high cost areas of the state. Utah Code Annotated Section 54-8b-3(c) and (d) permit any carrier of last resort (“COLR”) to request one-time distributions from the UUSF. The rules that govern such distributions should address the issues enumerated below.

#### **LIST OF ISSUES REGARDING ONE-TIME DISTRIBUTIONS FROM THE UUSF**

1. One-time distributions from the UUSF should be used to deploy and manage networks capable of providing voice and broadband service in high cost geographic areas of the state where it is not economical to deploy facilities.
2. The deployment of such facilities should be in the public interest.
  - a. To determine public interest, the Commission should look at the economics of each project including the retail services or wholesale services to be provided, the project’s impact on the UUSF, and the number/nature of customers who benefit.
  - b. The Commission should impose a cap on one-time distributions so that annually they don’t exceed a certain percentage of the UUSF.
  - c. Specific grants from the Legislature could be sought if the demand for one-time distributions exceeds the cap set by the Commission.

3. Applications for UUSF one-time distributions should contain adequate cost information to enable the Commission to determine public interest. The application should include the COLR's share of project costs. The Commission should establish the maximum amount that the UUSF would contribute to each project, so that if actual costs are not at the maximum set by the Commission, the UUSF distribution could be lower (but not higher).

4. End user contributions for a project should generally not be required, and in those situations where an end user contribution may be in the public interest, the end user contribution should not be excessive.

5. The applications for one-time distributions should be adjudicated in a timely and efficient manner.

### **CONCLUSION**

URTA and its members appreciate the opportunity to provide this issues list and will plan on participating in the Technical Conference on March 15, 2018 to answer questions and provide input into the process.

Dated this 8<sup>th</sup> day of March, 2018.

BLACKBURN & STOLL, LC



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CERTIFICATE OF SERVICE

I hereby certify that on the 8<sup>th</sup> day of March, 2018, I served a true and correct copy of URTA List of Issues to Be Discussed at the One-Time Distribution Technical Conference March 15, 2018, 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 via e-mail transmission to following persons at the e-mail addresses listed below:

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