Gary A. Dodge, #0897
HATCH, JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, UT 84101
Telephone: 801-363-6363
Facsimile: 801-363-6666
Email: gdodge@hjdlaw.com
Attorneys for the AT&T Companies

BEFORE THE UTAH PUBLIC SERVICE COMMISSION

In the Matter of the Utah Administrative Code R746-360 Universal Public Telecommunications Service Support Fund	DOCKET NO. 17-R360-01 **INITIAL COMMENTS OF THE AT&T COMPANIES**

I. Introduction

The certificated AT&T Companies, together with AT&T wireless providers, including AT&T Corp., Teleport Communications America, LLC, New Cingular Wireless PCS, LLC, d/b/a AT&T Mobility, and Cricket Wireless, LLC (collectively, the "AT&T Companies") submit these Comments in response to the Request for Comments dated March 27, 2017 (the "Request"). The Request invites comments from affected parties regarding any aspect of the rulemaking required under Senate Bill 130 ("S.B. 130") which gives the Public Service Commission of Utah ("Commission") more flexibility in funding the Utah Universal Public

Telecommunications Service Support Fund ("UUSF") in addition to the Commission's general oversight of the fund.

AT&T strongly supports the goals of universal service both at the federal level and locally in Utah, in particular, its rural communities. AT&T serves more rural households than any other telecommunications carrier in the United States which gives AT&T a unique understanding of the challenges of serving rural communities. Wider availability of broadband internet to consumers and businesses across Utah will improve access to educational opportunities, healthcare, job opportunities, and information; facilitate e-commerce, stimulating economic growth; improve efficiency for businesses, agricultural operations, and other activities in the public and private sectors. Recognizing these benefits, AT&T offers these comments to assist in designing an effectively and efficiently targeted UUSF high-cost support mechanism that is most likely to help Utah realize the benefits of ubiquitous broadband internet access.

In this regard, AT&T strongly urges the Commission to retain the current contribution methodology for the UUSF. Comprehensive USF contribution methodology reform should first be addressed nationally by the Federal-State Joint Board on Universal Service and the FCC, and state USF programs should then be harmonized with FCC requirements to ensure the greatest possible consistency across states and with the federal program and to avoid an undue administrative burden on telecommunications carriers. The push for a change in contribution methodology appears to presume without evidence that there is a need to grow the fund and without acknowledging that Utah consumers ultimately bear the cost of any increase in UUSF contributions. AT&T estimates that Utah carriers currently receive more than $36 million per year in federal Connect America Fund ("CAF") high-cost universal service support for voice and broadband services.[1] Utah's tax surcharge burden for wireless service is also already the 16th highest in the nation.[2] AT&T also urges the Commission to direct high-cost support for broadband internet access services ("BIAS") to Utah's unserved areas not reasonably anticipated to receive federal support in the foreseeable future. Thus, AT&T recommends that the Commission promulgate rules to ensure the most efficient and effectively targeted distribution of UUSF funds, to require recipients to make available end-user BIAS in unserved areas not receiving federal CAF support, and to otherwise ensure the fund is no larger than needed, for no longer than needed.

II. AT&T supports retaining the existing state USF contribution methodology based on intrastate revenues while USF contribution reform issues nationally are pending before the Federal-State Joint Board on Universal Service and the FCC.

As CTIA argues in its comments in this proceeding, switching from the current contribution methodology based on a percentage of intrastate revenues to a per connection basis is problematic at this time for numerous reasons.

Any effort to change contribution methodology to the UUSF is premature. In its August 2014 USF Joint Board Contributions Referral Order ("Joint Board Referral Order"), the FCC tasked the Federal-State Joint Board on Universal Service ("Joint Board"), comprised of

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[1] See discussion *infra*, Section II. See also Federal Communications Commission (FCC), "State, County and Carrier Data on $9 Billion, Six-Year Connect America Fund Phase II Support for Rural Broadband Expansion" (press release; Sept. 15, 2015), available at: https://apps.fcc.gov/edocs_public/attachmatch/DOC-335269A1.pdf (citing Annual Support by Company, State, Carrier available at: https://apps.fcc.gov/edocs_public/attachmatch/DOC-335269A5.xlsx); FCC, "State, County and Carrier Data on $9 Billion, Six-Year Connect America Fund Phase II Support for Rural Broadband Expansion" (press release; Sept. 15, 2015), available at: https://apps.fcc.gov/edocs_public/attachmatch/DOC-335269A1.pdf (citing Annual Support by Company, State, Carrier available at: https://apps.fcc.gov/edocs_public/attachmatch/DOC-335269A5.xlsx); and Universal Service Administrative Co. (USAC), "Funding Disbursement Search," available at: http://www.usac.org/hc/tools/disbursements/ (last visited April 25, 2017).

[2] Scott Mackey & Joseph Henchman, *Wireless Tax Burdens Rise for the Second Straight Year in 2016*, Tax Foundation, Oct. 11, 2016, https://taxfoundation.org/wireless-tax-burdens-rise-second-straight-year-2016/ (last visited Apr. 21, 2017) (ranking Utah as 16th highest state in the nation for taxes, fees, and government charges on wireless service).

representatives from the FCC and state utility commissions, with issues of universal service contribution methodology reform, requesting the Joint Board's recommendations by April 7, 2015,[3] "with a particular focus on how any modifications to the contribution system would impact achievement of the statutory principle that there be state as well as federal mechanisms to preserve and advance universal service."[4] Acknowledging that the universal service contribution system had become "increasingly complex and difficult to administer"[5] since the FCC had chosen to assess contributions on an end-user revenue basis following enactment of the federal Telecommunications Act of 1996,[6] the FCC asked the Joint Board to review the record developed and make recommendations regarding issues raised in the FCC's 2012 Further Notice of Proposed Rulemaking ("*2012 FNPRM*"), which sought comment on "who should contribute, how contributions should be assessed, and how to make the system more transparent and fair,"[7] focusing "especially on issues that would impact the important role of the states in accomplishing universal service objectives and protecting consumers…[in furtherance of] the goals of improving the efficiency, fairness and sustainability of the contribution system."[8]

As the Joint Board Referral Order makes clear, the USF contribution issues this Commission is considering in this proceeding are squarely before the Joint Board, which is

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[3] *See In the Matter of Federal State Joint Board on Universal Service*, WC Docket No. 96-45, *Universal Service Contribution Methodology*, WC Docket No. 06-122, *A National Broadband Plan for Our Future*, GN Docket No. 09-51, Order, FCC 14-116 (released Aug. 7, 2014), available at https://apps.fcc.gov/edocs_public/attachmatch/FCC-14-116A1.pdf (last checked April 25, 2017).
[4] *Id.*, ¶ 1 (footnotes omitted).
[5] *Id.*, ¶ 2 (footnotes omitted).
[6] *Id.* (footnotes omitted).
[7] *Id.* (footnotes omitted).
[8] *Id.*, ¶ 3 (footnotes omitted). The FCC subsequently acknowledged that a "short extension" of the April 7, 2015 deadline for the Joint Board's recommendation may have been necessary given the FCC's March 2015 action in GN Docket No. 14-28. *See* Report & Order on Remand, Declaratory Ruling, and Order, *In the Matter of Protecting & Promoting the Open Internet*, FCC 15-24 ¶ 489 n.1491. (released Mar. 12, 2015). The D.C. Circuit has upheld this order; several parties have filed a petition for *en banc* review. As of this date, the Joint Board's contribution methodology recommendations are pending.

comprised mostly of states' representatives as required by the federal Telecommunications Act.[9] Given the significant complexity of universal service contribution issues, Utah should not attempt contribution reform in a vacuum without considering implications for other states and for the federal USF. Rather, AT&T recommends that this Commission work with the Joint Board to develop a comprehensive approach to universal service contribution reform that addresses all states' programs and the federal universal service fund in a comprehensive, coordinated and systematic manner. This is the best approach for several reasons.

Any new state contribution methodology must not "rely upon or burden" the federal USF, as required pursuant to 47 USC § 254(f). Because the FCC decided to assess a percentage of interstate telecommunications revenues, given the FCC's and the states' respective jurisdictional limitations, the courts have clearly established that the federal USF may assess interstate but not intrastate telecommunications revenues; and on this basis, the FCC and the courts have provided "bright line" guidance that if states assess telecommunications revenues, the states may assess intrastate but not interstate telecom revenues for state USF purposes.[10]

At present, there is no clear FCC guidance on how a state should structure a per-line or per-connection contribution methodology in a manner such that the state USF will not "rely upon or burden" the federal USF. If Utah decides to switch to a connection-based contribution

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[9] *See* 47 U.S.C. §§ 410(c), 254(a)(1).

[10] *See, e.g.*, *AT&T Corp. v. Public Util. Comm'n of Texas*, 373 F.3d 641 (5th Cir. 2004) (finding Texas USF assessment of interstate/international revenues violated the 47 U.S.C. § 254(f) mandate that state USF contribution requirements be "equitable and nondiscriminatory"); *AT&T Communications, Inc. v. Eachus*, 174 F.Supp.2d 1119 (D. Or. 2001) (finding Oregon's state USF assessment of interstate/international revenues relied upon interstate revenues also assessed for federal USF purposes, thereby "burdening" federal USF support mechanisms, in conflict with 47 U.S.C. § 254(f)); *but see Office of Reg. Staff v. South Carolina Pub. Serv. Comm'n*, Opinion No. 26354 (SC Supreme Court filed June 25, 2007) (holding that the SC USF's assessment of interstate revenues did not burden federal universal service support mechanisms and therefore did not violate 47 U.S.C. § 254(f)); see also *In the Matter of Universal Service Contribution Methodology, Petition of Nebraska Public Service Commission & Kansas Corporation Commission for Declaratory Ruling or, in the Alternative, Adoption of Rule Declaring that State Universal Service Funds May Assess Nomadic VoIP Intrastate Revenues*, Declaratory Ruling, WC Docket No. 06-122, FCC 10-185, ¶ 17 (FCC released November 5, 2010).

methodology in the absence of such FCC guidance, Utah risks a later determination that Utah's assessment is impermissible, making the state's assessment vulnerable to legal challenge.

A deviation in contribution methodology in Utah from the existing revenue-based methodology would also impose a heavy administrative burden on telecommunication providers who would be forced to overhaul their operations in support of the new Utah-specific methodology. This would include modifying accounting and reporting practices; revising any customer-facing materials, websites, and customer service staff support systems and training materials describing UUSF recovery charges; and modifying any UUSF recovery charges and how they are calculated in billing systems (of which individual carriers may have several). These Utah-specific regulatory burdens would serve no business purpose and have no corresponding benefit for contributing providers like AT&T, who operate across the United States and internationally.

Moreover, such a change could be inequitable by shifting an even greater portion of the UUSF contribution burden to wireless carriers. Assessable revenues from wireless carriers may have dropped over the last few years, but assessable revenues from ILECs have also dropped at a similar rate. While wireless carriers' assessable revenues dropped 33% from January 2009 to December 2015,[11] ILECs' assessable revenues also dropped 35% over the same period.[12] This is reflective of a current general trend of consumer preferences shifting from voice services that are assessable by the federal and state universal service funds to internet access services that are not subject to USF assessment by either state USFs or the federal USF. Contributions from wireless carriers (who would not be allowed to draw from the UUSF to fund mobile wireless broadband

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[11] *See* Comments from Utah Rural Telecom Association, Exhibit A, filed May 16, 2016, Utah Public Services Commission Docket No. 16-R360-02.
[12] *Id.*

availability) continue to bear the lion's share of the UUSF funding burden – 67% in January 2009 and 66% in December 2015.[13] The proportion of ILEC contributions has also remained relatively constant at 21% of the UUSF in January 2009 versus 20% in December 2015.[14]

If Utah moves to a per-connection assessment, Utah voice subscription data shows that the already-significant UUSF funding burden borne by the mobile wireless segment and their wireless customers could grow even further. Mobile wireless carriers accounted for 76% of the voice lines in Utah in December 2015, while ILECs accounted for 10% of the voice lines.[15] While switching to a connection contribution methodology might increase contributions from wireless carriers, it may also lead to lowered contributions from ILECs and other UUSF contributors, though ILECs alone are eligible for UUSF high-cost support. Switching to a per connection contribution methodology could well increase the proportional share of UUSF funding paid by wireless carriers who already account for two-thirds of the current size of the fund.[16] Yet wireless carriers are not allowed to draw any support whatsoever from the UUSF to address the availability of mobile wireless broadband services.

If the drive underlying proposals to change the contribution methodology is to increase the size of UUSF which is funded ultimately by Utah consumers, it is not clear that growing the UUSF is necessary to fulfill the objectives of the program. As an initial matter, we note that the state has an obligation to ensure the UUSF is no larger than needed to attain its core objectives, including the availability of services at affordable rates, since ultimately Utah consumers bear the costs of the UUSF.[17]

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[13] *Id.*
[14] *Id.*
[15] *Id.*
[16] *Id.*
[17] *See* 47 USC § 254(b)(1).

We estimate that Utah carriers now receive more than $36 million per year in federal CAF universal service support for voice and broadband services.[18] Among other things, the rate of return ILECs in Utah who voluntarily elected to receive CAF model-based support are guaranteed about $12.6 million per year in these federal support dollars for a 10-year period, $125.6 million in federal USF support in total.[19] Utah's two price cap carriers, CenturyLink and Frontier, also voluntarily elected to receive CAF model-based support, more than $4.4 million per year for 6 years, a total of more than $26 million.[20] CenturyLink and Frontier may also elect to receive an optional seventh year of funding which could result in total funding of more than $31 million over 7 years.[21] Any evaluation of whether and to what extent the UUSF should be enlarged should account for the already considerable amount of federal CAF support allotted to Utah's rate of return and price cap carriers. Forcing carriers to migrate to a new contribution methodology is not needed necessarily nor would it be the fairest way to grow the UUSF, if this Commission should deem that increasing the burden on Utah consumers was warranted. The only certainty is that an overhaul of UUSF contribution methodology will be inefficient and burdensome for telecommunications providers in Utah.

[18] Federal Communications Commission, "Wireline Competition Bureau Authorizes 182 Rate-of Return Companies to Receive $454 Million Annually in Alternative Connect America Cost Model Support to Expand Rural Broadband" (press release; Jan. 24, 2017), n.3 available at: https://apps.fcc.gov/edocs_public/attachmatch/DA-17-99A1.pdf, citing "Summary of all carriers authorized to receive A-CAM, Census Blocks eligible for A-CAM support, and broadband location obligations" available at: https://apps.fcc.gov/edocs_public/attachmatch/DOC-343180A1.xlsx (summarizing all carriers authorized to receive A-CAM, list of CBs eligible for A-CAM support, and broadband location obligations).

[19] *Id.*

[20] Federal Communications Commission, "State, County and Carrier Data on $9 Billion, Six-Year Connect America Fund Phase II Support for Rural Broadband Expansion" (press release; Sept. 15, 2015), available at: https://apps.fcc.gov/edocs_public/attachmatch/DOC-335269A1.pdf, citing "Annual Support by Company, State, Carrier" available at: https://apps.fcc.gov/edocs_public/attachmatch/DOC-335269A5.xlsx.

[21] *Id.*

III. The Commission should create rules for distribution of Utah USF funds that are consistent with CAF II rules.

As discussed in CTIA's comments, AT&T also believes that the Commission should promulgate regulations that ensure that the high-cost component of the UUSF complements, and does not duplicate, funding provided by the Connect America Fund or any other federal infrastructure program.

As discussed above, Utah carriers currently receive more than $36 million per year in federal CAF universal service support which will expand access to broadband internet access services to significant number of Utah end user locations. More than 14,000 locations in rate-of-return carrier service territories will be receiving model-based support.[22] Of these, rate-of-return carriers are obligated to deploy and maintain broadband internet access services at speeds of 25 Mbps downstream and 3 Mbps upstream ("25/3") to more than 2,300 locations and at speeds of 10 Mbps download and 1 Mbps upload ("10/1") to more than 7,000 locations.[23] Even those rate-of-return carriers who will receive CAF Broadband Loop Support ("BLS") for stand-alone broadband lines, a form of legacy federal high-cost USF support, must spend a specified percentage of their federal CAF BLS support to deploy 10/1 or faster broadband internet access service in areas with less than 80% deployment of 10/1.[24] Likewise, price cap carriers who accepted CAF II model-based support are required to deploy and maintain 10/1 broadband

[22] Federal Communications Commission, "Wireline Competition Bureau Authorizes 182 Rate-of Return Companies to Receive $454 Million Annually in Alternative Connect America Cost Model Support to Expand Rural Broadband" (press release; Jan. 24, 2017), n.3 available at: https://apps.fcc.gov/edocs_public/attachmatch/DA-17-99A1.pdf, citing "Summary of all carriers authorized to receive A-CAM, Census Blocks eligible for A-CAM support, and broadband location obligations" available at: https://apps.fcc.gov/edocs_public/attachmatch/DOC-343180A1.xlsx (summarizing all carriers authorized to receive A-CAM, list of CBs eligible for A-CAM support, and broadband location obligations).
[23] Id.
[24] *See* 47 C.F.R. § 54.308(a)(1).

internet access service to more than 9,500 locations in Utah.[25] The federal CAF support flowing to Utah will thus have a meaningful, positive impact upon the availability of broadband internet access services in the state. It would be wasteful and duplicative to direct UUSF support for broadband internet access to areas that are already funded by CAF dollars.

Given the significant CAF support earmarked for Utah, the UUSF's rules should disallow recipients from "double dipping," drawing from both state and federal funds to subsidize the same network facilities in the same geographic areas. These rules should ensure that the UUSF targets the areas with the greatest broadband internet access needs – areas where end users have no access to broadband internet access service at 10/1 speeds and that are not receiving CAF support.

The Commission should also adopt rules that require funding recipients to offer 10/1 broadband services to end users in those eligible areas. The objectives that Utah policy makers are seeking to achieve in directing UUSF support to broadband access – like improved access to education, healthcare, and government, facilitating job searches, and laying the basis for further economic development activities – can only be achieved if end user consumers who currently lack broadband internet access get that access. In the absence of such a requirement, funding recipients could well build gold-plated networks financed by the UUSF – which is ultimately funded by Utah's consumers – without any obligation to offer broadband internet access service to even a single end user Utah consumer. This risk exists because S.B. 130 permits the funding

[25] FCC News Release, *State, County and Carrier Data on $9 Billion, Six-Year Connect America Fund Phase II Support for Rural Broadband Expansion* (Sept. 15, 2015), and accompanying attachments available at https://www.fcc.gov/document/connect-america-fund-phase-ii-funding-carrier-state-and-county (last visited April 25, 2016).

of "*wholesale* broadband Internet access service," without any requirement to offer any services to end user customers whatsoever.[26]

The Commission must also ensure that the UUSF is "right-sized," no larger than needed in recognition of support flowing to Utah from other sources, such as the federal CAF support mechanisms. The funding burdens of the UUSF impose costs on all telecommunications carriers in Utah which, more importantly, is ultimately borne by Utah's customers. The UUSF should support broadband in the most efficiently and effectively targeted way possible, so that Utah's consumers pay no more than necessary to achieve the policy objective of universal availability of broadband and voice services. We also recommend that the Commission identify funding recipients' service obligations that mirror those of federal CAF support recipients to UUSF recipients, such as articulated high speed internet download and upload speed requirements, monthly usage allowance, and maximum latency requirements.

IV. <u>The Commission should develop rules that require recipients to report to the commission, promoting recipient accountability.</u>

Given the Commission's obligation to report annually to the Legislature regarding "the availability of services" that can be funded pursuant to S.B. 130[27] and the "effectiveness and efficiency" of the UUSF,[28] AT&T recommends that the Commission establish rules that require UUSF recipients to identify the number of previously-unserved end user locations that gained access to broadband internet access as a result of UUSF support. As discussed above, failure to establish such rules could potentially result in the deployment of facilities without any obligation to offer services to end users, which would not help Utah to reach the societal benefits that result

[26] Utah S.B. 130, enrolled copy, lines 322-323.
[27] S.B. 130, enrolled copy, lines 431-432, 436-437
[28] S.B. 130, enrolled copy, lines 431-432, 438-439.

from increasing broadband availability such as better access to educational activities, health care, and government services. The Commission can and should promulgate rules to fill this gap.

V. <u>The Commission should establish a cap and sunset for the UUSF.</u>

Because Utah's consumers ultimately bear the costs of funding the UUSF, the Commission should clearly articulate the objectives of the UUSF and regularly monitor Utah's progress in achieving those objectives. A sunset date for the fund should be specified to ensure that the continuing need for support is periodically evaluated; and every carrier receiving high-cost support should be required to demonstrate a need for support. Because Utah carriers currently receive approximately $36 million per year from the federal CAF, we recommend that the Commission account for the federal support received currently and in the future by Utah carriers when determining the appropriate size of the UUSF.

VI. <u>Summary</u>

For the reasons argued herein, AT&T urges the Commission to retain its current contribution methodology based on intrastate revenues for the UUSF and that the Commission work with the Federal-State Joint Board on Universal Service address USF contribution methodology reform nationally at the federal and state levels, as well as consistently across states, to promulgate rules that guarantee the efficient use of UUSF funds that do not duplicate distribution of federal funds and that require UUSF recipients to guarantee an increase in BIAS access to end users, and to protect Utah consumers by ensuring the UUSF is not unnecessarily over-funded.

The AT&T Companies appreciate the opportunity to provide these comments.

DATED this 26th day of April 2017.

HATCH, JAMES & DODGE

/s/ ______________________________
Gary A. Dodge
Attorneys for AT&T Corp., Teleport
Communications America, LLC, New
Cingular Wireless PCS, LLC, d/b/a
AT&T Mobility, and Cricket Wireless, LLC

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing Initial Comments of the AT&T Companies this 26th day of April 2017, on the following by electronic mail:

Utah Division of Public Utilities
Patricia Schmid (pschmid@utah.gov)
Justin Jetter (jjetter@utah.gov)
Chris Parker (chrisparker@utah.gov)
Erika Tedder (etedder@utah.gov)

Utah Office of Consumer Services
Steven Snarr (ssnarr@utah.gov)
Robert Moore (rmoore@utah.gov)
Michele Beck (mbeck@utah.gov)
Cheryl Murray (cmurray@utah.gov)

Bob Kraut (bob@atcnet.net) - Albion Telephone Company, Inc.
Jenny Prescott (jenny.prescott@allwest.com) - All West Utah, Inc.
Janet McFarland (j.mcfarland@centracom.com) - Bear Lake Communications
Bryan Scott (bscott@beehive.net) - Beehive Telecom, Inc.
Brock Johansen (bjohansen@emerytelecom.com) - Carbon-Emery Telecom Inc.
Blake Madsen (bmad@cut.net) - Central Utah Telephone
Ted Hankins (ted.hankins@centurytel.com) - CenturyTel of Eagle, Inc.
Kirk Lee (kirk.lee@ftr.com) - Citizens Telecommunications Company of Utah
Diane (diane@directcom.com) - Direct Communications Cedar Valley, LLC
J. Frandsen (jfrandsen@emerytelcom.com) - Emery Telephone
Douglas G. Pace (dpace@ftitel.net) - Farmers Telephone Company, Inc.
Kent Sanders (kent@gtelco.net) - Gunnison Telephone Company
D. Woolsey (dwoolsey@emerytelcom.com) - Hanksville Telecom, Inc.
Dallas Cox (dallasc@mail.manti.com) - Manti Telephone Company
Barbara Saunders (west.consumer.relations@czn.com) - Navajo Communications Company, Inc.
Jim Farr (james.farr@centurylink.com) - Qwest Communication, QC dba CenturyLink QC
Blake Madsen (bmad@cut.net) - Skyline Telecom
Alan Torgersen (alant@socen.com) - South Central Utah Telephone Association, Inc.
Jerilyn Hyder (jhyder@stratanetworks.com) - UBTA-UBET Communications, Inc.
John Woody (jowoody@union-tel.com) - Union Telephone Company
James Woody (jwoody@union-tel.com) - Union Telephone Company
Brett N. Anderson (bretta@blackburn-stoll.com)
Vicki Baldwin (vbaldwin@parsonsbehle.com)
Sharon Bertelsen (bertelsens@ballardspahr.com)
Larry Bowman (larry.bowman@charter.com)
Brian W. Burnett (bburnett@kmclaw.com)
cflregulatory@chartercom.com
Eddie L. Cox (ecox@cut.net)
William J. Evans (bevans@parsonsbehle.com)
James Farr (james.farr@centurylink.com)
Amy Gross (agross@tminc.com)
Alan Haslem (ahaslem@mleainc.com)
Ray Hendershot (ray.hendershot@beehive.net)

William Huber (william.huber@questar.com)
Bill Hunt (williamp.hunt@dish.com)
David R. Irvine (D@aol.com)
Kristin L. Jacobson (Kristin.l.jacobson@sprint.com)
Brock Johansen (bjohansen@emerytelcom.com)
Dawn Kubota (kubotad@ballardspahr.com)
Jasen Lee (jlee@desnews.com)
Kirk Lee (kirk.lee@ftr.com)
Shirley Malouf (srmalouf@stoel.com)
Jennifer H. Martin (jhmartin@stoel.com)
Steve Mecham (sfmecham@gmail.com)
Gregory Monson (gbmonson@stoel.com)
Thorvald Nelson (tnelson@hollandhart.com)
Sheila Page (spage@utah.gov)
Mike Peterson (mpeterson@utahcooperatives.org)
Pam Pittenger (pam.pittenger@ftr.com)
Jenny Prescott (jenny.prescott@allwest.com)
Bruce Rigby (bruce@ucmc-usa.com)
Gary Sackett (gsackett@joneswaldo.com)
Kira Slawson (kiram@blackburn-stoll.com)
Alan L. Smith (alanakaed@aol.com)
Ted D. Smith (tsmithlaw@earthlink.net)
Kendra Thomas (kthomas@kfrservices.com)
Bruce H. Todd (btodd@stratanetworks.com)
Jake Warner (jakew@beehive.net)
Benjamin J. Aron (baron@ctia.org) - CTIA
Matthew DeTura (mdetura@ctia.org) - CTIA
Margaret Thomson (mt4348@att.com) - AT&T
Janice Ono (jo5243@att.com) – AT&T
John Sisemore (js2023@att.com) – AT&T

/s/ ______________________________
Gary A. Dodge