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**BEFORE THE UTAH PUBLIC SERVICE COMMISSION**

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In the Matter of the Utah Administrative Code R746-360 Universal Public Telecommunications Service Support Fund	DOCKET NO. 17-R360-01  <b>COMMENTS OF THE AT&amp;T COMPANIES IN RESPONSE TO NOTICE OF RULEMAKING</b>
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The certificated AT&T Companies, together with AT&T wireless providers, including AT&T Corp., Teleport Communications America, LLC, New Cingular Wireless PCS, LLC, and Cricket Wireless, LLC (collectively, “AT&T” or the “AT&T Companies”) submit these Comments in response to the Notice of Rulemaking and Response to Comments issued May 15, 2017 (the “Notice”). The Notice invited comments from affected parties by July 3, 2017 regarding Proposed Rule R746-360-4, titled “Application of Fund Surcharges to Customer Billings” (“Proposed Rule”), meant to comply with Senate Bill 130 (“SB 130”) which gives the Public Service Commission of Utah (“Commission”) more flexibility in funding the Utah Universal Public Telecommunications Service Support Fund (“UUSF”).

## **I. Introduction**

The Proposed Rule attempts to impose a change in the UUSF contribution methodology from an intrastate revenue basis to a per line basis in less than a month, by August 1, 2017. As AT&T has previously discussed at length in its Comments and Reply Comments in the instant proceeding, AT&T continues to urge the Commission to retain Utah's current intrastate revenue based UUSF contribution methodology. USF contribution reform is best addressed at the national level, and given UUSF's surplus as reported by the Department of Public Utilities ("DPU"), the haste to make Utah the first state to experiment with switching to a per line contribution base is unwarranted. The Proposed Rule leaves open many questions that should be addressed before a final rule is promulgated:

- Which services (as defined by technology) are assessable?
- Which lines (as defined by billing address or otherwise) are assessable?
- Whether and how to collect the surcharge for prepaid wireless equitably?
- Given the Commission's inability to require some retailers of prepaid services to collect or remit the proposed UUSF surcharge, should further legislation be enacted?
- How to collect the surcharge on all-inclusive wireless plans?
- How to assess the per line surcharge in an equitable manner for consumers versus businesses?

The number and complexity of these open questions demand further comment from affected parties, making the contemplated August 1, 2017 implementation date unreasonable and impracticable. Although AT&T believes the Commission should retain the current UUSF contribution methodology and work with the Federal-State Joint Board on Universal Service to

address possible reform, to the extent that the Commission intends to move forward, AT&T explains herein why further comment is needed on these issues and offers recommendations on how to address some of these open questions and ambiguities.

**II. Subsection 1 of the Proposed Rule should more clearly define “access lines” and “providers” to establish a bright-line basis of assessment for UUSF contributions.**

- a. Subsection (1)(b) of the Proposed Rule defines “access lines” to possibly assess non-interconnected VoIP and non-regulated providers and services which should be clearly exempted.**

The Proposed Rule defines “access lines” to include “technology or equipment that allows an end-user to place or receive a real-time voice connection.” As an initial matter, the Commission does not have the jurisdiction to assess “technology or equipment.” The definition should refer instead to “services.”

More importantly, because the definition uses the disjunctive “place *or* receive,” the Proposed Rule would impose the assessment upon non-interconnected, *i.e.*, one-way VoIP services, and other services beyond the jurisdictional authority of the Commission. For example, a non-cellular iPad using Skype or FaceTime over a wireless network to video chat in real-time arguably qualifies as “technology or equipment that allows an end-user to place or receive a real-time voice connection” and therefore would be subject to UUSF assessment, even though the Commission has no authority to assess such services.

The FCC itself does not assess one-way VoIP services for the federal USF; only interconnected VoIP services are assessable for federal USF purposes. In its Declaratory Ruling In the Matter of Universal Service Contribution Methodology (“*KS/NE Declaratory Ruling*”), the FCC identified the compliance parameters for states that wish to assess VoIP services for their state USFs and addressed only the issue of state USF assessments for interconnected VoIP, not

one-way VoIP.<sup>1</sup> While the *KS/NE Declaratory Ruling* allows states to assess interconnected VoIP for state USFs, it also acknowledges that “‘the FCC has made clear it, and not state commissions, has the responsibility to decide’ whether intrastate VoIP services should be subject to universal service assessments.”<sup>2</sup> As one-way VoIP is not assessed for the federal USF, and the FCC has not allowed assessment of one-way VoIP, Utah is likewise limited in its ability to assess this service.

Accordingly, AT&T opposes assessment of non-interconnected VoIP services and recommends that the Proposed Rule limit assessment of VoIP services to interconnected VoIP. Specifically, AT&T recommends that Subsection 1(b) be amended to read “... ‘access line,’ ... means ~~equipment or technology services~~ that ~~allows~~ allow an end-user to place ~~or~~ and receive a real-time voice communication.”

**b. Subsection (1)(c)’s definition of “providers of access lines” is vague and ambiguous as to which providers and services are required to contribute.**

By defining “providers of access lines” to include providers of “functionally equivalent connections,” the Proposed Rule muddies the waters, making it unclear which providers or services should be assessed for UUSF contributions. As discussed above, Skype video chat and FaceTime are both examples of what could be construed as “functionally equivalent

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<sup>1</sup> See generally *In the Matter of Universal Service Contribution Methodology, Petition of Nebraska Public Service Commission and 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*, WC Docket No. 06-122, *Declaratory Ruling*, 25 FCC Rcd. 25651, FCC 10-185 (rel. Nov. 5, 2010) (“*KS/NE Declaratory Ruling*”); see also *In the Matter of Universal Service Contribution Methodology [and] A National Broadband Plan for Our Future*, WC Dkt. No. 06-122 & GN Dkt. No. 09-51, *Further Notice of Proposed Rulemaking*, 27 FCC Rcd. 5357, FCC 12-46, ¶ 57 (rel. Apr. 30, 2012).

<sup>2</sup> *KS/NE Declaratory Ruling*, ¶ 13, citing *Vonage Holdings Corp. v. Nebraska Public Service Comm’n*, 564 F.3d 900, 905 (8th Cir. 2009).

connections” that the Commission does not have the authority to assess. AT&T urges the Commission to revise the Proposed Rule to provide clear guidance on how to assess the UUSF on those services that the Commission has jurisdiction to assess.

Prepaid wireless consumers and carriers should contribute to the UUSF under Subsection (1)(b), but SB 130 and the Proposed Rule do not provide a collection mechanism for prepaid wireless services. To the extent that SB 130 and the Proposed Rule assess wireless service for UUSF contributions, both prepaid and postpaid wireless service should be assessed. Nothing in SB 130 or the Proposed Rule would exclude wireless service based on how consumers pay for such service. That said, there is also nothing in SB 130 or the Proposed Rule that provides how a per access line surcharge should be assessed and collected for prepaid wireless service.

Although it is unclear whether contributions from prepaid wireless were contemplated by either the Legislature or the Commission, AT&T’s position is that prepaid wireless services should contribute to the UUSF. Because prepaid wireless comprises a significant segment of the wireless business, exempting prepaid wireless services from contribution to the UUSF only increases the fee burden on postpaid services and other contribution sources. USF contribution methodologies should not drive purchasing decisions. Rather, USF contribution methodologies should be broadly-based and competitively neutral. Otherwise prepaid wireless would effectively gain a pricing advantage over other wireless and telecommunications services, by being exempt from the assessment. To this end, AT&T recommends establishing a point of sale

(“POS”) UUSF assessment that piggybacks on the existing state E911 point of sale methodology to collect from prepaid wireless.<sup>3</sup>

Because the Commission does not have the authority to require non-carrier third party retailers of prepaid wireless services and top-up cards to collect the UUSF surcharge, a point of sale collection methodology would likely require the enactment of additional legislation which AT&T would support. Such legislation would be the most competitively neutral way to collect the UUSF surcharge from prepaid wireless consumers and providers.

AT&T acknowledges that a temporary exemption for prepaid wireless services may be necessary to allow additional time for the enactment of legislation that enables collection of the UUSF surcharge at the point of sale for prepaid wireless. A temporary exemption or longer implementation period for contributions from prepaid wireless providers and retailers would also be helpful to prepaid carriers to allow them time to adjust their forward-looking budget models. Finally, for the period that prepaid wireless does not contribute to the UUSF, the UUSF should not support state Lifeline discounts for prepaid wireless either. The result would be inequitable otherwise.

**III. Subsection (3)(a) of the Proposed Rule defines assessable “access lines” in a way that risks double-assessment by other states and federal preemption.**

Subsection (3)(a)(i) imposes the UUSF surcharge on access lines that have “a physical endpoint within the State of Utah.” Under the Proposed Rule as drafted, wireless end users who

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<sup>3</sup> Maine has a POS process for collection of the state USF fee for prepaid wireless service that could be helpful in formulating a process for Utah. In Maine, the 911 fee is added to the state USF fee assessment, and the two fees are combined in a total single line item charge. Maine’s Department of Revenue separates the two fees upon receipt and assigns them to the proper agency. *See* 65-407-284 ME. CODE R. §§1-6 (2017).

live outside of Utah could technically be subject to the surcharge based on brief amounts of time they might have a “physical endpoint” in Utah while visiting the state. Such out of state visitors are likely already subject to the USF surcharge in their home state. The Proposed Rule could thus unfairly result in end users being assessed for state USF contributions in more than one state.

Subsection (3)(a)(ii) imposes the surcharge on access lines “as to which the provider has an associated address within the state of Utah.” As drafted, the Proposed Rule would unfairly subject some wireless consumers who do not live within Utah to the UUSF surcharge. For example, an out of state college student who is included on her parents’ family wireless plan with a Utah billing address will result in the student’s line being subject to the surcharge, even though that student uses her wireless phone mostly in another state where she is likely already subject to another state USF surcharge. The Proposed Rule could have similar inequitable results for businesses. An enterprise with multiple office locations that has a billing address within Utah could have access lines in other states. The Proposed Rule results in subjecting those non-Utah lines to assessment by both Utah and those other states. The FCC has found such duplicative state assessments to violate federal rules and policies, risking federal preemption.<sup>4</sup>

AT&T recommends that the definition of assessable access lines be made consistent with the E911 service address determination and with the Mobile Telecommunications Sourcing Act

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<sup>4</sup> See *KS/NE Declaratory Ruling*, ¶¶ 19-21 (concluding that duplicative state assessments of interconnected VoIP services conflict with federal rules and policies in violation of the rules adopted in the *Interim Contribution Methodology Order*, risking preemption by the FCC, and likening the risk of duplicative assessment of interconnected VoIP services to duplicative assessment of wireless services caused by states adopting different standards to allocate use according to billing address versus principal place of use).

(“MTSA”),<sup>5</sup> as required by SB 130. For fixed location services, we recommend for those that have a service address in Utah, assessment should be consistent with the E911 service address. We note that UUSF assessable access lines cannot simply mirror the method used to determine assessable lines for E911. For E911 in Utah, only voice lines are subject to assessment, but there are non-voice telecom services (e.g., special access services) that should also contribute to state USFs. For mobile wireless services and interconnected VoIP, the assessable location should be consistent with the place of primary use (“PPU”), as defined by the Mobile Telecommunications Sourcing Act (“MTSA”):<sup>6</sup>

The term “place of primary use” means the street address representative of where the customer’s use of the mobile telecommunications service primarily occurs, which must be

- (A) the residential street address or the primary business street address of the customer; and
- (B) within the licensed service area of the home service provider.<sup>7</sup>

The FCC also requires states to employ an assessment methodology for interconnected VoIP services analogous to the MTSA PPU methodology for wireless services to avoid duplicative state assessments and federal preemption.<sup>8</sup> Note also that SB 130 requires compliance with the MTSA.<sup>9</sup>

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<sup>5</sup> Congress passed the *Mobile Telecommunications Sourcing Act* (“MTSA”) in 2000, codified in 47 U.S.C. §§ 116-126, which determined, among other things, that a single location for sourcing taxes and fees upon wireless carriers would be based on the customers’ place of primary usage (either residential street address or primary business street address).

<sup>6</sup> *KS/NE Declaratory Ruling*, ¶ 21.

<sup>7</sup> MTSA, § 124(8).

<sup>8</sup> *KS/NE Declaratory Ruling*, ¶¶ 19-21.

<sup>9</sup> See 2017 Utah Laws Ch. 412 (S.B.130), § 54-8b-15(11) (“An access line or connection provider that provides mobile telecommunications service shall contribute to the Universal Public Telecommunications Service Support Fund only to the extent permitted by the Mobile Telecommunications Sourcing Act, 4 U.S.C. Sec. 116 et seq.”).



Defining which access lines are assessable consistent with the MTSA would also eliminate the need for the waiver process contemplated in Subsections (5) and (6) of the Proposed Rule. As a general matter, AT&T opposes the individual consumer waiver process described in the Proposed Rule because it creates uncertainty and imposes significant administrative burdens on providers, making it difficult for providers to comply. The proposed waiver process requires any petition to be “adjudicated in an informal administrative proceeding” and that the end user demonstrate that “at all times and continuously during the six calendar months preceding the date of petition, the access line...was not used to access Utah intrastate telecommunications services.” Such an individualized inquiry does not seem to be reasonably practicable statewide. The Proposed Rule also does not explain how providers should know whether and which end users receive an exemption. Such a process would require providers to monitor for any such waivers on an individual subscriber basis and then manually exempt the customer from the assessment, which is very burdensome for any company, especially those whose systems and processes are scaled to deliver services to tens of millions of customers such as AT&T. There would be a time lag between when a consumer notifies the provider of the exemption and when the provider is able to modify the customer’s account. This monitoring would also need to be constant since the exemption would be granted only for a one-year period. This waiver process is unnecessary if the Commission establishes a clear definition of the access lines subject to assessment as suggested above.

**IV. Subsection 3(b) of the Proposed Rule requires the UUSF surcharge to “apply... as a separate charge,” depriving prepaid wireless providers of their ability to offer all-inclusive rate plans.**

The Proposed Rule’s requirement that the UUSF surcharge “apply...as a separate charge” is problematic for prepaid wireless services that have a single all-inclusive rate such that surcharges, taxes and fees are not separately assessed. As discussed, AT&T would support legislation that establishes a point-of-sale methodology with a longer implementation period to collect UUSF assessments from prepaid wireless services, by piggybacking on Utah’s existing 911 POS collection methodology. This would also better help to ensure competitive neutrality by ensuring that *all* prepaid wireless services are contributing to the support of the UUSF. However, if the Commission insists that prepaid wireless contribute to the UUSF without establishing a POS assessment process, providers should not be required to impose the surcharge “separately” if they choose to pay the per-line assessment on behalf of their end user customers without a specific UUSF surcharge on the end user.

**V. Other significant issues regarding appropriate per-line assessment amounts require further consideration and comment.**

There are additional issues left unaddressed in this proceeding that could have significant impact on the administration of the UUSF. Under the Proposed Rule, as written, a large special access line would be assessed at the same \$0.36/month fee as a consumer home landline. Does the fee impose relatively disproportionate or fair burdens on consumers versus businesses? How should multi-line business service lines be counted? Is the Proposed Rule competitively neutral? Whether prepaid wireless is required to contribute to the UUSF is still an open question. If not, the fee would not be competitively neutral and could potentially drive consumer purchasing decisions. A consumer may favor purchasing prepaid wireless service not subject to UUSF

assessment to postpaid wireless service. These issues demand further consideration and comment by the Commission and affected parties.

**VI. The Proposed Rule’s switch to a “per access line” contribution methodology starting August 1, 2017 is unnecessary, unreasonably rushed, and impracticable for providers.**

Under Subsection (3)(a) of the Proposed Rule, providers are supposed to switch to a per connection contribution methodology as of August 1, 2017, even though comments are not due until July 3, 2017 and it remains unclear what the final rule may look like, whenever it may be issued. This timeline gives providers less than one billing cycle to give notice to affected customers and to implement the rule after it is made final.

Further comment is necessary given the number of open questions and need for further refinement of the rule. Whether and how to assess postpaid wireless and one-way VoIP, ensuring consistency with MTSA, how to equitably assess consumers versus businesses – these are all open questions not addressed by the Proposed Rule. The Commission should take comment on these questions before deciding whether to implement the flat fee per line contribution methodology. Until the Commission adopts a new rule, the UUSF program will continue to be funded based on intrastate revenue, and the Commission retains the ability to adjust the intrastate revenue-based assessment as needed while it considers these issues. The \$750,000 and growing surplus as of March 2017 reported by the Department of Public Utilities<sup>10</sup> demonstrates that such haste is unnecessary in the short-term. Moreover, under SB 130, a change to per line contribution methodology is not mandated, merely permitted; rules do not have to be established until the end of the year; and there is no implementation date dictated by the bill. And while CenturyLink

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<sup>10</sup> Comments of Utah Division of Public Utilities (“DPU Comments”), p. 2, filed April 26, 2017, Utah Public Services Commission Docket No. 17-R360-01.

suggests that switching to a per connection methodology is necessary to assess VoIP services,<sup>11</sup> the Commission could just as easily promulgate a rule that assesses VoIP services based on intrastate revenues. The Commission should instead focus on consistency with federal practice<sup>12</sup> and on assuring fairness of the UUSF assessment.

More importantly, affected providers face significant hurdles if required to implement the proposed rule by August 1, 2017. Such a timeline is impracticable, depriving providers of the ability to give their customers adequate notice. There is less than one billing cycle between an order being issued sometime after July 3, when comments are due, and the proposed implementation of the rule on August 1. The Commission has argued that providers have had notice since March that this rule would be implemented, but that misconstrues SB 130 which permits but does not require the Commission to adopt per line contribution methodology and allows the Commission to retain the status quo contribution methodology. It is unreasonable to expect providers to implement plans to transition to a per line contribution methodology when

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<sup>11</sup> Comments in Response to Notice of Rulemaking of CenturyLink (“CenturyLink Comments re. Rulemaking”), pp. 2-3, filed June 30, 2017, Utah Public Services Commission Docket No. 17-R360-01.

<sup>12</sup> CenturyLink asserts that it “is not aware that AT&T, Comcast, CTIA or any provider publicly raised any concerns during the legislative process about the UUSF having to remain coordinated with the Federal USF revenue based method, despite having numerous opportunities to raise this issue.” CenturyLink Comments re. Rulemaking, p. 3. ***This is untrue.*** Throughout the legislative process, discussions between affected providers, and the instant proceeding, AT&T has consistently articulated its concerns that a switch to a per connection methodology could conflict with federal USF collection methodology. *See, e.g.*, Universal Service Fund Amendments: Hearing on S.B. 130 Before Utah Senate Standing Committee on Transportation, Public Utilities, Energy, and Technology, (Feb. 9, 2017) (testimony of Tara Thue, External & Legislative Affairs Director, AT&T), *available at* [http://utahlegislature.granicus.com/MediaPlayer.php?clip\\_id=21071&meta\\_id=669440](http://utahlegislature.granicus.com/MediaPlayer.php?clip_id=21071&meta_id=669440) (last visited June 30, 2017) (testifying at the 1 hour 9 minute mark about AT&T’s five main policy concerns, including the concern that a per line or per connection UUSF assessment basis would be inconsistent with federal USF methodologies and guidelines).

such a move is not necessarily mandated by SB 130, when so many open questions as discussed herein still exist, and when a final rule has not been issued. Affected providers cannot be expected to start implementation of a rule that has not been finalized. The final rule may differ substantively from the Proposed Rule. As AT&T has discussed in its previous comments, transitioning from the existing methodology is burdensome, requiring changes to our customer-facing materials regarding the USF, customer-facing representative training materials, and to our billing systems.

AT&T understands that the Commission is very anxious to implement a new rule as soon as possible, and to that end AT&T believes the earliest reasonable effective date for any proposed rule is no sooner than the beginning of the next fiscal quarter, October 1, 2017, ideally January 1, 2018 or later.

## **VII. Conclusion.**

For the reasons argued herein, AT&T urges the Commission to retain Utah's current intrastate revenue based UUSF contribution methodology, to continue to investigate and seek comment on the open questions discussed herein, and, at the very least, to not make effective any new rule until January 1, 2018 or later before deciding whether to switch to a per line UUSF contribution methodology. The AT&T Companies appreciate the opportunity to provide these comments.

DATED this 3<sup>rd</sup> day of July, 2017.

Respectfully submitted,



By:

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## MAILING CERTIFICATE

I hereby certify that I served a true and correct copy of the foregoing Reply Comments of the AT&T Companies this 3<sup>rd</sup> day of July 2017, on the following by electronic mail:

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