
BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Utah Administrative
Code R746-360 Universal Public
Telecommunications Service Support Fund

Docket No. 17-R360-01

COMMENTS OF CTIA

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CTIA submits this filing in response to the Request for Comments and Draft Rule Language¹ in the above-captioned Docket, issued by the Public Service Commission of Utah (“Commission”) on September 5, 2017.

As CTIA has discussed in detail in its prior comments in this proceeding, the Commission’s rules implementing S.B. 130 must be consistent with *all* provisions of the statute. The Commission cannot choose to timely implement a rule that is, for example, discriminatory and not competitively neutral.² CTIA maintains its position that without point of sale collection, the Commission’s proposed rule is discriminatory and is not is not competitively neutral.³ As a result, there are no edits to the proposed rule that CTIA could offer that would resolve this fundamental problem.

¹ *In the Matter of the Utah Administrative Code R746-360 Universal Public Telecommunications Service Support Fund*, Request for Comments and Draft Rule Language, Docket No. 17-R360-01 (issued Sept. 6, 2017), <https://pscdocs.utah.gov/Rules/17R36001/29646817R36001rfcadrluusfaopwnopr9-5-2017.pdf>.

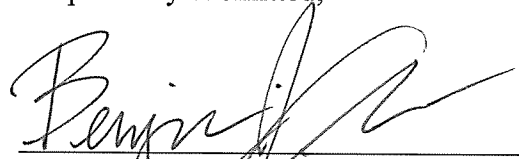
² See Comments of CTIA, Docket No. 17-R360-01 (filed Oct. 4, 2017); Comments of CTIA, Docket No. 17-R360-01 (filed Oct. 2, 2017); Reply Comments of CTIA, Docket No. 17-R360-01 (filed Aug. 2, 2017); Comments of CTIA, Docket No. 17-R360-01 (filed July 3, 2017).

³ See Comments of CTIA, Docket No. 17-R360-01 (filed Oct. 4, 2017); Comments of CTIA, Docket No. 17-R360-01 (filed Oct. 2, 2017).

For all of the reasons it has discussed before, CTIA urges the Commission not to adopt the proposed rule.

Respectfully submitted,

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October 17, 2017

CERTIFICATE OF SERVICE

I certify that, on October 17, 2017, a true and correct copy of the foregoing Comments of CTIA in Docket No. 17-R360-01 was delivered to the following by electronic mail:

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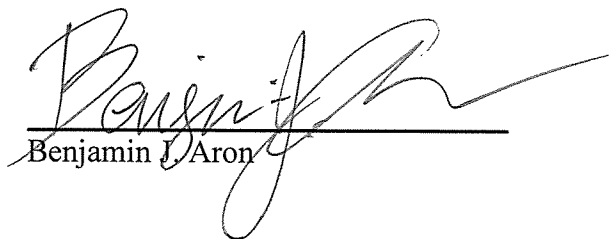
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