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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Utah Administrative Code R746-349)	Docket No. 22-R349-01
)	
)	COMMENTS OF UTAH RURAL
)	TELECOM IN RESPONSE TO THE
)	AMENDMENT TO R746-349
)	PUBLISHED IN THE UTAH STATE
)	BULLETIN ON OCTOBER 15, 2022

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, E Fiber Moab, LLC, E Fiber San Juan, 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 files these Comments in support of the revised R746-349 that were attached as Exhibit A, to the Utah Public Service Commission’s (“Commission”) Notice of Proposed Rule Amendment issued on October 6, 2022 in this docket and the amended rules that were published in the State Bulletin on October 15, 2022. These revised rules propose to revise R746-349.

URTA, on behalf of its members, supports the administrative rule amendments contained in R746-349, which were published in the Utah State Bulletin on October 15, 2022.

PROCEDURAL HISTORY

On June 16, 2021, in Docket No. 21-R008-03, the Commission issued a Notice and Request for Comments, seeking comments on whether it is necessary to modify the Commission's existing administrative rules to address the administration of the Utah Universal Service Fund distributions to carriers of last resort with overlapping telecommunication service exchanges. Comments were filed by the Office of Consumer Services (the "Office"), the Division of Public Utilities (the "DPU"), the Utah Rural Telecom Association ("URTA"), E Fiber Moab, LLC, and E Fiber San Juan, LLC. Reply Comments were filed by the Office and URTA. The Commission held several status meeting updates, and on June 17, 2022, Joint Comments and a Proposed Rule were filed by the DPU, the OCS, URTA, and Frontier Communications ("Frontier"). After review of the Comments, the Commission published the proposed Rule R746-349 ("Proposed Rule") in the Utah State Bulletin on October 15, 2022. Public Comments on the Proposed Rule are due November 14, 2022.

URTA COMMENTS

As indicated above and as the Commission is aware, URTA previously provided two rounds of Comments and participated in a third round of Joint Comments to the Commission prior to the Commission's publication of the Proposed Rule in the Utah State Bulletin. URTA supports the Proposed Rule as drafted. The proposed changes to R746-349-1, 2, 3, and 4 correct typographical errors and other non-substantive changes which are appropriate. R746-349-10

establishes requirements if a certificated carrier of last resort seeks UUSF support for a service are for which another provider is also a certificated carrier of last resort. The Proposed Rule establishes the information and plan that the telecommunications provider must include with an application for UUSF support, the notice to be provided, the guidelines under which all interested parties may intervene and participate, and the criteria the Commission will consider when determining UUSF support. The proposed modifications provide regulatory certainty, transparency, and consistency to the application of Utah Code 54-8b-2.1 and 54-8b-15 and Utah Admin. Code R746-349. URTA supports these modifications and the language published in the Utah State Bulletin.

CONCLUSION

URTA appreciates the opportunity to work with the Division, the Office, the Commission and the stakeholders on these rules. URTA fully supports the Proposed Rule as published.

Dated this 7th day of November, 2022.

BLACKBURN & STOLL, LC



Kira M. Slawson
Attorneys for Utah Rural Telecom
Association

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of November, 2022, I served a true and correct copy of URTA Comments in Response to the Proposed Amendment to Administrative Code R746-349 Published in the State Bulletin and contained in Docket No. 22-R349-01 via e-mail transmission to following persons at the e-mail addresses listed below:

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