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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of an Investigation into Pole Attachments	<p style="text-align: center;"><u>Docket No. 04-999-03</u></p> <p style="text-align: center;">Utah Rural Telecom Association ("URTA") Comments to Commission on the Standard Contract submitted to the Public Service Commission February 10, 2006</p>
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The URTA makes the following comments on the Standard Pole Attachment Contract the Division submitted to the Public Service Commission ("Commission") February 10, 2006:

Attached is a copy of the contract with minor corrections. URTA did not reargue any of the issues that the Commission has reviewed and decided. The only suggested change that could be considered substantive is in Section 7.03 that makes clear that payment of disputed bills is subject to Section 5.03.

Sections 3.02, 3.05, and 3.09 of the contract all address the make ready self-build option and affect the Commission's pending rule R746-345-3 on make ready work. URTA urges the Commission to retain the sections in the contract on the self-build option as they are and to reject the proposed changes to the R746-345-3. As URTA stated in comments on the proposed rule, not allowing the self-build option for electrical attachments virtually nullifies the purpose for the self-build option. In addition, the proposed change treats telecommunications and cable attachments differently, and if there are adjustments required in the electrical space on any pole, there is no reason to separately hire a contractor to do the telecommunications or cable work.

The proposed change could hamper telecommunications pole owners because they will not be able to use anyone else but the affected electrical corporation to move the electrical attachment. The Commission can adequately address any safety concern by requiring that the list of contractors who perform the make-ready work be certified to work in the electrical space and that the work be subject to the Pole Owner's inspection.

Respectfully submitted this 31st day of May, 2006.

Callister Nebeker & McCullough

Stephen F. Mecham

Certificate of Mailing

I hereby certify that the 31st day of May, 2006, I emailed a true and correct copy of the foregoing Utah Rural Telecom Association Comments to Commission on the Standard Contract submitted to the Public Service Commission February 10, 2006 to the following:

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