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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") Fourth Set of Comments to Proposed Rule R746-345 Pole Attachments of Public Utility Companies</p>
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The URTA makes the following comments on the proposed changes to R746-345 published March 15, 2005:

URTA remains concerned about the following proposed language in R746-345-5:

A[~~based on a~~] fair and reasonable method that will accomplish this objective is to use the portion of the pole owner's costs and expenses for the pole plant investment that is jointly used by the [~~an~~] attaching entit[~~y~~]ies as a proxy for the incremental costs.

Can this standard only be interpreted one way when it is applied? Is it the Commission's intent that the standard be suggestive or is it required? Are there other methods that will accomplish the objective that are not included in the rule? URTA recommends that the sentence be clarified or eliminated to avoid future disputes. The Commission's intent is not clear and the sentence could be interpreted and used in ways that are inconsistent with the rest of the rule.

Respectfully submitted this 14<sup>th</sup> day of April

Callister Nebeker & McCullough

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Certificate of Service

I hereby certify that the 14<sup>th</sup> day of April, 2005, I emailed a true and correct copy of the foregoing URTA Brief on the Proposed Pole Attachment Standard Contract to the following:

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