

November 19, 2008

Ted Boyer, Chair
Ric Campbell, Commissioner
Ron Allen, Commissioner
Public Service Commission
Heber M. Wells Bldg., 4th Floor
Salt Lake City, Utah 84111

Re: Utah Rural Telecom Association's Request for Reconsideration of Commission's Denial of Petition for Rulemaking on Capital Structure in Docket No. 07-999-09

Dear Commissioners:

I am writing in support of the Utah Rural Telecom Association's request that the Commission reconsider its denial of the Division of Public Utilities' Petition for Rulemaking to enact a capital structure rule. As you will recall, the Commission established the Capital Structure Taskforce last February and asked the Division to chair the Taskforce. I participated in the Taskforce's many meetings representing Citizens Telecommunications Company of Utah (d/b/a Frontier Communications of Utah) and Navajo Communications Company, Inc. In addition to the Division and the Association, the Committee of Consumer Services and various individual members of the Association including Emery Telcom, UBTA-UBET Communications and CentraCom Interactive also actively participated in the Taskforce's deliberations.

The Taskforce's proposed rule, which was embodied in the Division's September 15, 2008 recommendation, constitutes a carefully crafted compromise dealing with several extremely difficult issues. Frontier and Navajo view the compromise as a much-needed means of introducing greater certainty into the ratemaking process and avoiding burdensome and costly disputes.

Like the Association, Frontier and Navajo ask that the Commission meet with the Taskforce to express their concerns and see if the Taskforce can address them. Frontier and Navajo also ask that the Commission reconsider its denial and publish the rule for comment.

Sincerely,



Curt Huttsell, Ph.D.
Manager, Government and External Affairs