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Sandy Mooy
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Public Service Commission
Heber M. Wells Bldg., 4th Floor
160 East 300 South
Salt Lake City, Utah, 84111

Re: URTA comments on Complete Filing draft rule in **Docket No. 09-999-08**

Dear Sandy:

Attached are URTA's proposed changes to the Commission's Complete Filing draft rule in Docket No. 09-999-08, but the changes represent are offered in the alternative. URTA's preferred position is for the Commission to amend Utah Admin. Code Rule R746-344, "Filing Requirements for Telephone Corporations With Less Than 5,000 Access Line Subscribers," so that it includes all telecommunications corporations with fewer than 30,000 access lines.

Utah Code Ann. § 54-7-12(7) is intended to impose less stringent regulation on telecommunications service providers serving fewer than 30,000 access lines. Prior to 2001, 54-7-12(7) only applied to providers serving fewer than 5,000 access lines, but in the 2001 general legislative session the legislature increased the number to 30,000 access lines. The Commission, however, did not correspondingly amend R746-344 to reflect this statutory change. URTA, therefore, recommends that the Commission make this change now in this docket in lieu of adopting the attached draft rules applicable to telecommunications corporations.

Sincerely

Callister Nebeker & McCullough

Stephen F. Mecham