



State of Utah

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*Commissioner*

March 17, 2011

Patrick D. Crocker  
Crocker & Crocker, P.C.  
107 West Michigan Avenue, Fourth Floor  
Kalamazoo, MI 49007

**RE: Docket No. 11-999-03**

Dear Mr. Crocker,

On March 9, 2011, the Commission received a notice from you on behalf of your client, Billing Services of America, Inc. You stated it was your understanding that “resellers are exempt from” Commission regulation and referred to Utah Code Ann. § 54-2-1(29). That section, however, defines a “water corporation.” This is likely a mistake. If you would, please clarify to the Commission, in writing, to which section you intended to refer.

Sincerely,

/s/ Julie Orchard  
Commission Secretary  
G#71560