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Attorney for the AT&T Companies

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of a Request for Agency Action	:	Docket No. 12-999-05
For Creation of a Telecom Working Group to	:	
Address Possible Streamlined Procedures for	:	COMMENTS OF
Approving Changes Mandated by the FCC	:	THE AT&T COMPANIES

AT&T Communications of the Mountain States, Inc. and TCG Utah. (together “the AT&T Companies”) respectfully submit these Comments in response to the Notice of Technical Conference in this docket issued May 24, 2012 (the “Notice”). The Notice requests “comments from parties concerning the actions, findings, proceedings, or other requirements which need to be undertaken by either the Commission or certificated Utah carriers, associated with complying with the [FCC] Transformation Order.”

There are a number of issues that will need to be addressed arising from this Order, most dealing with various deadlines and milestones built into the Order. The most immediate and pressing is probably the half-step move towards parity between interstate and intrastate access rates which deadline passed earlier this month. Using the formula contained in the Transformation Order, most carriers were obliged to change their intrastate access rates in the

direction of interstate parity. Since the July deadline has passed, it is perhaps too late for the Commission to take an active role in monitoring compliance, but should be prepared for possible disputes among carriers if any are discovered to be non-compliant. There are other topics to be considered, and the AT&T Companies will reserve comment on those until after seeing the comments of other parties.

Respectfully submitted,

/s/

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MAILING CERTIFICATE

I hereby certify that on the 10th day of July, 2012, I caused to be served a copy of the Comments of the AT&T Companies on the following person by overnight delivery and electronic mail:

Trixie Behr, Commission Secretary
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111
Email: tbehr@utah.gov

I also hereby certify that on the 10th day of July, 2012, I caused to be served a copy of the Comments of the AT&T Companies on the following persons by electronic mail:

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