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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Consideration of Potential Changes in the Regulation of the Utah Universal Public Telecommunications Service Support Fund, in Response to Recent Changes in the Federal Universal Service Fund Program	Docket No. 12-999-10
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On April 25, 2013 the Division of Public Utilities (“Division”) filed a Draft Report in the above-referenced docket (“Draft Report”). On May 20, 2013, the Utah Public Service Commission (the “Commission”) issued a Notice of Filing and Comment Period (“Notice”) pursuant to which the Commission invited all interested parties to submit comments on the Division’s Draft Report on or before June 4, 2013. The Utah Rural Telecom Association (“URTA”) welcomes the opportunity to provide these comments on the Division’s Draft Report and to address potential changes in the regulation of the Utah Universal Service Public Telecommunications Service Support Fund (“UUSF”)¹ in response to changes to the federal Universal Service Fund (“USF”) high cost programs in the above captioned docket.

As the Commission is aware, URTA has previously filed Comments in this docket which are incorporated herein by reference, and the majority of the information previously filed will not

¹ Utah Code Ann. Section 54-8b-15

be repeated herein. However, URTA appreciates the opportunity to provide comments on the Division's Analysis and Conclusion.

URTA agrees with the Divisions' conclusion that any changes to the UUSF must be well-conceived and above all allow for continuity of operations, particularly for rural carriers. The Division is correct that rural carriers have used and relied on UUSF payment to secure loans for capital improvements. The rural lenders have relied upon the carriers' receipt of UUSF payments, and have predicated loans to the carriers on that basis. Any change to the UUSF that is sudden or complete will be devastating to rural carriers, and will have significant negative impacts to rural customers. While URTA and its members do not agree with Verizon that the UUSF has served its purpose and because there is robust voice service to rural communities, UUSF is no longer needed, even if that were true, immediate elimination of the UUSF payments would significantly impact the rural carriers' ability to continue to provide voice services to its rural customers, and would put in jeopardy the ongoing operations of the rural carriers.

Therefore, as indicated in the Division's Draft Report, while the policymakers are wise to consider these issues now, any changes to the UUSF should be measured, well-conceived, and transitioned to in a slow and deliberate manner to ensure the rural carriers' continuity of operations.

Although the URTA members support delaying any wholesale changes to the UUSF until the impacts of the federal changes are known, URTA members strongly believe that the policymakers should consider transition of UUSF funds to include broadband network and facilities. The URTA members are aware that as the telecommunications industry changes, it will be increasingly difficult to delineate between voice service and broadband service facilities.

Conclusion

The UUSF is critical to the maintenance and development of a robust statewide telecommunications network. URTA commends the PSC and the Legislature for commissioning this study and preparing Utah for the future. However, URTA strongly recommends that state reforms be delayed until there is clarification from the FCC on the federal USF program, and the impacts of the federal program are ascertained. This will permit the State to develop a well-conceived approach to transitioning UUSF to broadband networks and applications, while preserving the rural carriers' ability to provide voice services to their customers.

Respectfully submitted this 4th day of June, 2013.

BLACKBURN & STOLL, LC

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Association

CERTIFICATE OF SERVICE
Docket No. 12-999-10

I hereby certify that on the 4th day of June, 2013, I served a true and correct copy of Utah Rural Telecom Association's Final Comments via e-mail transmission to the following persons at the e-mail addresses listed below, and was emailed to each individual who received (via email) the PSC Request for Comments and Notice of Technical Conference:

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