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Date: August 22, 2013

Subject: Office of Consumer Services Comments Regarding Filings to  
Revise Emergency Line Service Tariff Provisions.

- Bear Lake Communications, Inc., Docket No. 13-2201-T01
- Central Utah Telephone, Inc., Docket No. 13-040-T01
- Skyline Telecom, Docket No. 13-576-T01

On April 29, 2013, Bear Lake Communications, Inc., Central Utah Telephone, Inc., and Skyline Telecom (Companies) filed tariff revisions to their Emergency Line Service tariffs. The revisions as proposed would make three important changes to the existing tariffs:

- 1) Emergency Line Service would be grandfathered. Existing customers who subscribe as of May 31, 2013 would be able to retain their Emergency Line Service in the same quantity and at the same rates.
- 2) Emergency Line Service would continue until such time as the Company discontinues Emergency Line Service at its sole discretion.
- 3) Grandfathered Emergency Line Service would be limited to the Subscriber locations in service prior to the Effective Date of this tariff revision.

On May 30, 2013, the Commission issued an Order Suspending Proposed Changes to "Emergency Line Service" Tariff Provisions, Notice of Hearing, and Order. In the order the Commission noted that further discussion was needed regarding the Companies' request

to discontinue emergency line service *at its sole discretion*. On May 31, 2013 the Companies filed amended tariff filings removing the phrase “at its sole discretion” but retaining all other language of the April 29 filing.

On June 14, 2013, the Commission issued a Second Order Suspending Proposed Tariff Changes to “Emergency Line Service” Tariff Provisions, Notice of Hearing, and Order. At page 3 of this order the Commission stated:

“We have reviewed the Companies’ proposed changes to the emergency line service, the Division’s recommendation, and we note further evaluation is needed. We, therefore, determine it would be in the public interest to further examine these dockets by noticing these matters for hearing.”

On August 14, 2013, the Companies filed second amended tariff filings. The requested replacement language now reads:

As of the Effective Date of this tariff revision, Emergency Line Service is a Grandfathered Service pursuant to the General Rules and Regulations, Sheet No. 23.1. Existing customers who have subscribed to Emergency Line Service as of the Effective Date of this tariff, will be allowed to retain their Emergency Line Service in the same quantity and at the same rates listed below. Grandfathered Emergency Line Service may be moved by a customer to a different location. Once the grandfathered Emergency Line Service is terminated by the Subscriber, the service will no longer be available to that Subscriber.

On August 15, 2013, The Commission issued a Notice of Filing and Comment Period, in which interested parties were afforded the opportunity to submit comments no later than Thursday, August 22, 2013. The Commission stated its intent to approve the tariffs if no opposing comments were received.

The Office asserts that allowing any company to arbitrarily terminate an important service, such as emergency line service, is not in the public interest. The initial filings provided no indication of how any potential termination of the service might be noticed to customers or if the Commission would be notified.

It is the Office’s position that the Commission’s thoughtful consideration of the impact of the requested tariff changes on customers and the Commission’s willingness to question the reasonableness of the requests has resulted in a much better outcome for affected customers.

Recommendation: The Office recommends the Commission approve the requested second amended tariff filings for Bear Lake Communications, Inc., Central Utah Telephone, Inc., and Skyline Telecom.