

Roger Moffitt  
Utah State Bar No. 05320  
The AT&T Companies  
Telephone: (628) 444-7526  
E-mail: [roger.moffitt@att.com](mailto:roger.moffitt@att.com)

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In The Matter of Emery Telephone's	)	DOCKET NO. 15-042-01
Application for an Increase in Utah	)	
Universal Service Fund Support	)	PETITION TO INTERVENE OF
	)	THE AT&T COMPANIES
	)	

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In accordance with Rule R746-100-7 of the Commission's Rules of Practice and Utah Code §63G-4-207, AT&T Corp., Teleport Communications America, Inc., SBC Long Distance, LLC, BellSouth Long Distance, Inc., Cricket Communications, Inc., Cricket Wireless, LLC, and New Cingular Wireless PSC, LLC (collectively, the "AT&T Companies") petition the Utah Public Service Commission for permission to intervene in this docket, and state:

**I. NOTICES**

The name, address, and telephone number of the persons to whom communications to the AT&T Companies should be sent are:

Roger Moffitt  
AT&T Services, Inc.  
430 Bush Street, 1<sup>st</sup> Floor  
San Francisco, CA 94108-3735  
Telephone: (628) 444-7526  
E-mail: [roger.moffitt@att.com](mailto:roger.moffitt@att.com)

## **II. IDENTITY OF PETITIONERS**

The AT&T Companies are (1) wireline providers of telecommunications service certificated by the Public Service Commission of Utah (“Commission”), (2) wireline interexchange carriers who are not required to be certificated by the Commission, and (3) wireless providers of telecommunications service authorized to conduct business throughout Utah.

## **III. INTEREST OF PETITIONERS**

The AT&T Companies will be substantially affected by this proceeding as supported by the following statement of facts:

1. Emery Telephone has filed an application for an increase in Utah Universal Service Fund (“UUSF”) Support, seeking some \$739,293 in recurring additional support, as well as a one-time lump-sum distribution from the UUSF for costs incurred associated with its application.
2. The AT&T Companies are all telecommunications companies under the terms of Utah Code §54-8b-15 and Rule R746-360 of the Commission’s Rules of Practice, and currently offer telecommunications services in the state of Utah.
3. Pursuant to Utah Code §54-8b-15 and Rule R746-360 of the Commission’s Rules of Practice, the AT&T Companies are required to make regular payments into the UUSF.
4. If the Commission grant’s Emery Telephone’s request for increased UUSF support, this will substantially increase the amount of money that the AT&T Companies will have to pay into the UUSF.
5. Customers of the AT&T Companies may be impacted if the AT&T Companies are forced to increase rates to cover the increased UUSF contributions that may be required as a result of the relief requested by Emery Telephone.

6. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing the AT&T Companies to intervene.

#### **IV. NATURE OF INTERVENTION**

The evidence to be presented by the AT&T Companies, if any, will be of material value to the Commission in its determination of the issues involved in this proceeding, and the AT&T Companies' intervention will not broaden those issues or delay the proceedings.

Accordingly, the AT&T Companies request permission to intervene as parties to this proceeding and to participate to the full extent permitted under the Commission's rules and Utah Law.

Submitted July 24, 2015.

By: \_\_\_\_\_  
Roger Moffitt  
Utah State Bar No. 05320  
AT&T Services, Inc.  
430 Bush Street, 1<sup>st</sup> Floor  
San Francisco, CA 94108-3735  
Telephone: (628) 444-7526  
E-mail: roger.moffitt@att.com

## MAILING CERTIFICATE

I hereby certify that on the 24<sup>th</sup> day of July, 2015, I caused to be served a copy of the PETITION TO INTERVENE OF THE AT&T COMPANIES on the following person by overnight delivery and electronic mail:

Melissa Paschall  
Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111  
Email: [psc@utah.gov](mailto:psc@utah.gov)

I also hereby certify that on the 24<sup>th</sup> day of July, 2015, I caused to be served a copy of the PETITION TO INTERVENE OF THE AT&T COMPANIES on the following persons by electronic mail:

Patricia Schmid  
Assistant Attorney General  
[pschmid@utah.gov](mailto:pschmid@utah.gov)

Chris Parker  
William Powell  
Dennis Miller  
Division of Public Utilities  
[ChrisParker@utah.gov](mailto:ChrisParker@utah.gov)  
[wpowell@utah.gov](mailto:wpowell@utah.gov)  
[dennismiller@utah.gov](mailto:dennismiller@utah.gov)

William Duncan  
Division of Public Utilities  
[wduncan@utah.gov](mailto:wduncan@utah.gov)

Michele Beck  
Cheryl Murray  
Utah Office of Consumer Services  
[mbeck@utah.gov](mailto:mbeck@utah.gov)  
[cmurray@utah.gov](mailto:cmurray@utah.gov)

Kira Slawson, Esq.  
Blackburn & Stoll, LC  
Counsel for Emery Telephone  
[kiram@blackburn-stoll.com](mailto:kiram@blackburn-stoll.com)

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Janice L. Ono  
Area Manager – Regulatory