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Before the Public Service Commission of Utah

In the Matter of Carbon/Emery Telecom, Inc.'s Application for an Increase in Utah Universal Service Fund Support	Docket No. 15-2302-01 Office of Consumer Services Response to Objection to Errata
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The Office of Consumer Services (“Office”) herby submits this Response to Carbon/Emery Telecom’s (“Carbon”) and the Utah Rural Telecom Association (“URTA”) Objection to the Office’s Errata Sheet. The numbers in dispute were changed in the Errata because the Office discovered that the calculations were not based on Carbon’s most recent UUSF funding request and believed that calculations based on the appropriate funding request would be more helpful to the Public Service Commission. (“Commission”). Upon review, the Office concedes that two of the changed numbers in the Objection indeed are not contained in the record; \$670,631, which appears in corrections number two and twelve, and \$368,083, which appears in corrections number three and thirteen.¹ Therefore, these numbers are subject to being stricken. However,

¹ Correction number one contains the number \$816,643, which is an obvious typo as the number refers to the Hearing Brief and correction number eleven which correctly list the number as \$816,909.

one challenged number is contained in the record; \$573,643, which appears in corrections number one and eleven. Specifically, during cross of Mr. Ostrander, Carbon's counsel referred to the number \$573,643 as Carbon's revised UUSF request.² However, this number differs from the number offered in Mr. Woolsey's hearing testimony of Carbon's revised revenue requirement of \$570,643.³

The confusion in the record regarding the revised UUSF request and the Office inadvertent inclusion of numbers not supported by the record is not of great import. The numbers in contention are merely summaries of the parties overall positions. The ultimate numbers will be determined by this Commission in resolving the parties' competing claims.

DATED March 14, 2016

Robert J. Moore
Attorney for the Office of Consumer Services

² Hearing Transcript, pg. 284, ln. 21.

³ Hearing Transcript, pg. 24, ln.16. Mr. Woolsey's hearing testimony refers to the number \$570,643; the \$573,643 number appears to be an inadvertent misstatement of counsel or possibly a transcription error.