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**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH**

IN THE MATTER OF THE)
2019 UTAH UNIVERSAL SERVICE FUN)
RECOMMENDATION FOR UNION) DOCKET NO. 18-054-01
TELEPHONE COMPANY.)

NOTICE AND REQUEST FOR OPPORTUNITY TO COMMENT

Union Telephone Company, (“Union”), by and through its undersigned counsel, hereby files its notice of an initial objection to the Comments of the Division of Public Utilities for the Utah Commerce Department (“Division”), as filed with the Utah Public Service Commission (“Commission”), on October 4, 2018. The Division, on October 4, 2018, issued its “2019 USF Recommendation for Union telephone Company” in which it indicated that it had reviewed the Annual Report of Union as submitted on August 30, 2018 and that pursuant to Commission Rule R746-8-401 (a) and (b), the Division had calculated Union’s USF eligibility to be \$0.00 annually. Union is concerned with the Division Recommendation and proposed assessment and requests an opportunity to respond.

It is Unions understanding that as a result of the Division’s action that there are a number of companies that disagree with their respective assessments on certain general legal grounds. It is Union’s further understanding that the companies will request to address certain general objections to the methodology utilized by the Division at the Commission’s scheduling

conference presently set for October 11, 2018. As to the scheduling conference, Union will have representatives attend in person and by telephone. It will be Union's position that following the Commission's review of the matter, the proceeding should be bifurcated to allow for the review of the general objections followed by an opportunity for individual companies to comment on specific individualized concerns. For instance, Union is concerned that the Division did not properly address the federal nature of Union's A-CAM (Alternative-Connect America Fund) proceeds and consequently has improperly recommended a reduction in Union's eligibility to the detriment of its customers. Union would like additional time in which to understand the Division's position and analysis prior to commenting on the specific recommendation.

Wherefore, Union Telephone Company respectfully requests that the Commission at its scheduling conference, bifurcate the instant proceedings to allow for a general review of the process followed by an individualized opportunity for companies to set forth their particular objection to the Division's proposed assessment.

Dated this 9th day of October, 2018.

UNION TELEPHONE COMPANY



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CERTIFICATE OF SERVICE

I CERTIFY that on October 9th, 2018, a true and correct copy of the foregoing was served upon the following as indicated below:

By Electronic-Mail:

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Utah Public Service Commission

Patricia Schmid: pschmid@agutah.gov
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